

**SPECIAL INTEREST GROUP COALITIONS:
GRASSROOTS OR ASTROTURF? --
ESTABLISHING ETHICAL STANDARDS
TO DEVELOP OR EVALUATE BROAD-BASED SUPPORT EFFORTS**

**A Thesis Presented to
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**by
Carol Ann Denter Bodensteiner**

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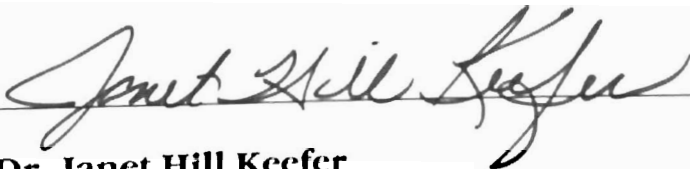
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An abstract of a thesis by
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May 1996
Drake University
Advisor: Dr. Henry Milam

This thesis is a study of special interest group use of the coalition technique to accomplish a public affairs agenda. The study provides a brief overview of the history of special interest group activity in the United States; discusses the legal restrictions placed on special interest groups by the laws of the State of Iowa and the United States of America. Further, this study considers the ethical implications of these actions in the context of the professional codes of the Public Relations Society of America and the International Association of Business Communicators.

The study is based on in-depth interviews regarding the operation of four coalitions which were formed to accomplish public affairs agendas at local and national levels. At the local level, the coalitions were formed by a for-profit corporation seeking to influence a ballot initiative. At the national level, one coalition was formed by a trade association and the other was formed by a foreign government. Each sought to influence a national public policy debate. The media coverage of these coalitions by "elite" media was analyzed to ascertain if the media performed in a watchdog capacity, informing the public if/when illegal or unethical actions occurred. Coalition activities were analyzed in the context of professional codes since coalitions are often formed and operated by public relations professionals.

The question considered in this thesis was whether, by the analysis of cases histories, media coverage and ethical codes, guidelines for the ethical formation and operation of coalitions by special interest groups could be established.

The findings of this study are that coalitions perform an important role when they represent a broad public interest, the "grass roots;" however when coalitions are formed without consideration for true representation of a broad citizen base, they may be deceptive, unethical and Astroturf-type front organizations, potentially damaging to the public interest. The media can play an important role in protecting the public interest by performing as diligent watchdogs, however they do not always rise to this responsibility. The public relations profession bears the brunt of media and public concern where unethical coalition activity occurs. Ethical guidelines for use by public relations practitioners, the media and the public are offered.

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Chapter 1 -- Introduction

“Where the voice of the lone dissenter may be heard in the New England town meeting (our romantic image of democratic society), the strident voice of the ‘movement’ is heard across the land. This is the force which turns media attention in new directions and which may turn societies in new directions.”
(Westley, 1987, p47).

Special Interest Groups (SIGS) organized to advance a specific cause have been part of the American political scene since Colonial days. Today, SIGS exist to advance almost any cause, from saving the environment or a specific animal (snail darters or Spotted owls), to encouraging a particular style of living (vegetarianism, family-based values, alcohol- or drug-free), to promoting a particular product, service or project (gambling, health care services or having a stop light installed at a busy intersection). SIGS are formed in a community to address a local issue or at the regional, national or international level to advance causes of much broader interest. SIGS may be long-lived to address an issue of ongoing concern to the group's members, or they may dissolve after dealing with the issue or goal that brought the group together.

SIGS usually work to advance some political agenda, to accomplish some change in the law or public policy. The United States' representative system of government is structured to be responsive to the wishes of the citizenry. As a result, the more ‘voices’ a special interest group represents, the more likely it is that a governing body will respond to the group's

wishes. To represent the greatest number of voices, special interest groups often find it helpful to join with others who have similar interests.

Coalitions are one of the tools special interest groups use to acquire greater power and advance their causes more effectively in the public affairs arena. Coalitions derive their power from the numbers of individuals and organizations they represent and the credibility attached to those numbers by the public and by policy makers.

To further the perception of coalitions as representative of a broad base of people, coalitions are frequently given names crafted to indicate the inclusive, grassroots nature of their membership. Common coalition names include: Concerned Maine Families (a group promoting an anti-gay rights agenda), the Coalition for a Competitive Food and Agriculture System (a group lobbying for change in government farm programs), and Citizens Clearinghouse for Hazardous Wastes (an organization of some 6,000 groups interested in hazardous waste disposal).

The effectiveness of coalitions in helping SIGS achieve public policy goals has encouraged even more individuals, groups and organizations to look to coalition-building as a weapon in their public affairs arsenal. It is not the premise of this study that organizations begin coalitions with the intent to deceive, nor that all coalitions do deceive. Unfortunately, however, some look for a quick fix and take shortcuts that amount to buying the results and manipulating the public rather than building relationships and involving the public at a legitimate level. This quick fix approach to coalition work has even generated a new name. Instead of "grassroots lobbying" -- utilizing legitimate coalitions which truly do speak for the broad base of individuals, groups or organizations they represent, -- then Treasury Secretary Lloyd

Bentsen dubbed the new phenomenon in which “front” groups imitate coalitions, “Astroturf Lobbying.”

Coalitions carry with them the perceived credibility of involvement by a wide range of interested parties. They imply a voice that speaks for many. When they deceive or mislead the public or policy-making bodies, they can undermine the professionalism of public relations and damage the public trust. It is arguable that a front group falsely purporting to be a broad-based grassroots organization abuses the First Amendment rights of assembly and petition. As a result, such front organizations should be a cause for ethical concern.

When a legitimate, strategic communications tool of the public affairs industry is misused in such a manner, it must be of great concern to all. The public, legislative bodies and the communications industry are all abused when unethical shortcuts are taken to form and operate coalitions.

Yet, what constitutes a legitimate coalition effort? How can the public, the media and governing bodies distinguish between a coalition that legitimately represents a broad grassroots section of the public and one with its basis in Astroturf? Further, what role do the media play in uncovering Astroturf coalitions? What guidelines should individuals, public relations professionals and organizations, which wish to form or participate in a coalition, follow to ensure that their efforts are credible and ethical?

Objective Of The Study

The purpose of this study is to analyze four coalition efforts: the Clarke County Development Corp., the Citizens for Riverboat Gambling, the Citizens for a Free Kuwait, and the Coalition for Health Insurance Choices. The analysis will be based on interviews with organization principals; a

comparison of whether the coalitions operated in compliance with standards of conduct of professional communication societies; and a review of media coverage of these four coalitions in the Washington Post, the New York Times, and the Des Moines Register.

These four coalitions were chosen for study because they are representative of how individual companies, national trade associations and governments use the coalition technique to advance their public affairs agendas at local, national and international levels.

Two coalitions were formed by, or involved, Argosy Gaming Co. to influence county ballot issues.

The Clarke County Development Corp. was established in 1994 by a local economic development group and involved Argosy Gaming with the objective of convincing Clarke County, Iowa, voters to pass a local referendum on riverboat gambling.

- Citizens For Riverboat Gambling was established by Argosy Gaming in 1993 to encourage Polk County, Iowa, voters to pass a referendum on riverboat gambling.

Two coalitions operated at the national level: one a foreign country seeking to influence the opinions of the American public; the other a trade association seeking to influence opinion on a national social issue.

- Citizens For A Free Kuwait was formed in 1989 to provide information to convince the United States population and government to support Kuwait during the Persian Gulf War.
- The Coalition for Health Insurance Choices was formed in 1992 by the Health Insurance Association of America to gain grassroots involvement of the American public in the nation's health care debate.

The media selected for this evaluation represent the “elite” media in terms of coverage of these subjects. “Elite” media have been defined as those media which frequently lead other media in subject coverage. The New York Times and the Washington Post are elite from a national perspective. The Des Moines Register frequently leads other media in its market. In addition, the media serve in a watchdog capacity for the public. If an organization is operating in a deceptive or misleading manner, how quickly do the media realize it and alert the public?

Evaluations of the four programs will be made in the context of ethical guidelines established by the Public Relations Society of America in its Code of Professional Standards for the Practice of Public Relations and the International Association of Business Communicators in its Code of Ethics.

Finally, the author will propose guidelines for use by public relations professionals, the media, governing bodies and the public for developing and evaluating coalition-building efforts.

Content Of The Study

This study contains four parts. Part I comprises the introduction and literature review, Chapters One and Two.

In Part II, Chapter Three offers a brief history of special interest groups in the United States, including SIG use of coalitions, and outlines ethical issues related to SIG operation. Chapter Four reviews elements of the codes of the Public Relations Society of America and The International Association of Business Communicators which apply to SIG coalitions. Chapter Five discusses legal restrictions on special interest groups

Part III offers two chapters, covering case analysis and media review. Chapter Six presents the four coalition cases, including who was involved.

what happened and what resulted from each campaign. Chapter Seven is a discussion of media coverage on the four cases.

In Part IV, Chapter Eight presents conclusions, suggested guidelines for use by any individual or group interested in developing or evaluating a coalition effort, as well as recommendations for additional research.

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Chapter 2 -- Literature Review

Two communication theories -- agenda setting and agenda building -- hold particular relevance for a study of special interest group use of coalitions.

The agenda setting theory explores the role of the media in determining not so much what the public thinks, but rather what the public thinks about. Agenda setting research also addresses the broader subject of who sets the agenda for the media and the interaction of individuals, special interest groups and the media in having an impact on policy making agendas.

Agenda building is the process of moving a subject from being an issue of interest to a few, to establishing it as a part of the public agenda (subjects of interest to individuals or groups within the general public), and subsequently having it adopted on the formal agenda (subjects addressed by legislative bodies) (Cobb, Ross & Ross, 1976).

Agenda-setting and agenda-building research overlap in many cases. However, while agenda-setting research focuses on the role the media play, agenda-building research looks at the broader context of policy making in which the media may or may not play a role.

Numerous studies of agenda setting have shown a correlation between what the media cover with regard to political and social issues and what the public is likely to say are the salient political/social issues (Protess & McCombs, 1991, p47-60, p61-69, p71-74, p75-88, p89-99, p119-125, p127-129).

The role of the media in shaping the public policy agenda is germane to this study as special interest groups increasingly use the media to raise

awareness of their agendas with the public and policy makers (Rose, 1991; Adams & Jennings, 1993).

In addition, the Washington, D.C. media have been described as a "shadow government" (Rivers, 1982) with the United States government and the media increasingly operating as a symbiotic unit. The government presents a desired image to the media; the media re-interprets that image and feeds it back through media coverage; the government thoughtfully reacts to this re-interpretation.

At the local level, research has explored whether the media set agendas or pass on priorities set by other individuals/organizations in society (Weaver & Elliott, 1985). One conclusion was that to a great extent the media reflect the city council agenda but do so in a "filtered" manner, reflecting but also making news judgments.

The public relies upon the integrity of the media to report the news accurately and completely. One expectation the public has of the media, and probably that the media have of themselves, is to perform in a watchdog role. It is relevant, then, to consider who sets the agenda for the media.

Agenda setting research has considered a number of points of influence. Turk looked at the role of public information officers in establishing what is covered in the media (1986). Gilberg and his colleagues looked at the President of the United States as a media agenda setter (Gilberg et al., 1980). The agenda setting effects of media on other media have also been established (Gans, 1979; Reese & Danielian, 1989).

Although many instances can be cited in which the media have been used to gain visibility for a special interest group issue, little research was found on the subject of how media are manipulated specifically to achieve

special interest group goals.¹ Only one study was found addressing this issue. Manheim and Albritton (1984) analyzed the efforts of six foreign countries who had retained public relations firms to improve their images in United States media. Since almost all publics rely on media coverage to gain information regarding the activities of foreign countries, as Manheim and Albritton point out, the “product of (public relations) activity becomes a primary source of both public opinion and policy action. ... (R)esearch suggests that actors external to this process are not necessarily passive or benign, that to the extent of their dependence on such actors as sources of information, the media are vulnerable to manipulation of projected images of reality” (p656).

With the exception of foreign entities, the media, public and government officials have access to a variety of information sources from which to form opinions. In this respect, the agenda-building process is a much more symbiotic endeavor that has possible built-in checks and balances

Studies to establish the agenda-setting impact of investigative reporting by the media on policy making have been inconclusive. Researchers studied several audiences who could have been influenced by media coverage of fraud and abuse in home care and found that watching the media did

¹ CBS ‘60 Minutes’ was the prime vehicle of the Natural Resources Defense Council to raise the Alar crisis in 1983. The People For the Ethical Treatment of Animals (PETA) routinely contact the media to cover their demonstrations. Special interest groups appear to be well versed in achieving media involvement, however, with the exception of the study noted above, media manipulation has not been a well-identified, researched strategy.

influence the general public's opinion of the importance of an issue. Media coverage also influenced government policy maker opinion but not the opinions of interest groups whose views were already firmly formed (Cook et al., 1983). A similar study on the subject of media coverage of rape showed the greatest impact on the media itself with more limited impact on other publics (Protest et al., 1985). The researchers reasoned this was because the rape issue already holds a high awareness level with all publics.

The studies found, however, that the policy elites were more likely to change policy based on working with media directly rather than because of public pressure. Journalists would work policy solutions into their stories. Policy makers who had been interviewed in the process of story development were more likely to implement those changes.

Widespread involvement by the public in the policy making process occurs through agenda building, both from the standpoint of developing new issues and in the context of redefining old issues (Cobb & Elder, 1971). In considering how agenda building occurs, special interest groups are an important point for consideration.

Special interest groups, which may include non-profit public interest groups, advocacy groups, pressure groups, corporations or individuals with a particular interest, have been politically active throughout United States history in forwarding their private agendas to gain legislative consideration. In the non-profit area alone, the Foundation for Public Affairs provides documentation on 226 public interest groups, ranging from community and grassroots organizations such as Mothers Against Drunk Driving, to groups concerned with accuracy in the media such as the Media Research Center, to well known environmental groups including the Izaak Walton League (Public Interest Profiles, 1992-93).

SIGS are most likely to participate in the policy process via agenda building, a process involving more influencers and points of influence.

Researchers Gladys Lang and Kurt Lang, who studied the relationship between the media and public opinion during the Watergate crisis, outlined six steps of “agenda building” (Lang & Lang, 1983).

- The media highlight events or activities;
- Different issues require different amounts of coverage to gain attention;
- Activities are “framed” or given a field of meaning;
- Language used by the media affects perception;
- Media link the activities to secondary symbols; and
- Agenda building accelerates when well-known individuals speak out.

Special interest groups have been instrumental over time in advancing causes to the nation’s “formal” agenda (Lipset, 1986). Civil rights, environmentalism, product safety, feminism, gambling, tax reform. These and countless other issues have been brought to legislative attention through the efforts of interest groups. The importance of special interest group efforts in advancing the legislative agenda has increased and refined in recent years.

According to Douglas J. Bergner, former executive director of the Foundation For Public Affairs, “It is clear that the public interest movement is an established, ongoing, and very significant factor in the formation of public policy today. In very different fashions and with often contrasting messages, public interest and public policy groups make government, business and the politicians act -- by raising issues and helping set the political agenda” (Bergner, 1986, p16).

Special interest groups have been studied as a starting point and as a sustaining factor in moving issues to the policy making stage. Special interest groups distribute information, hold events, create “news” to which the media must attend (Nelson, 1984; Westley, 1987). Even when gaining media attention is not the original objective, programs developed and actions taken by an organization can attract media attention. By attaining coverage in the media, special interest groups create broader awareness and an increased perception of the importance of issues among the general public. That perception of importance may be the impetus for policy makers to attend to the issue.

One frequently used tool of special interest groups is the coalition -- “a temporary alliance of distinct parties, persons, or states for joint action” (Webster, 1989, p253). Because they represent many voices, coalitions are frequently seen as credible representatives of public interest. They are also powerful in their ability to place pressure on policy makers, changing or accelerating the direction issues may take (Bergner, 1986; Novotny, 1990; Tucker & McNerney, 1992).

Perceived credibility of coalitions is their major strength (Hunt, 1993; Tucker & McNerney, 1993; Winkelman, 1989). As Hunt points out, the public and legislators frequently see a coalition message as “an unbiased view ‘of the people’” (p94).

Special interest groups have become more cognizant of the value of using public relations to advance their causes and more sophisticated in their use of public relations techniques, particularly strategic use of the media (Grover, 1989; Rose, 1991). Michael Pertschuk, former FTC chair and head of the Advocacy Institute, coined the term “media advocacy” to describe “the

strategic use of mass media for advancing a social or public policy initiative (Rose, 1991, p29).

Coalitions have become a popular tool for advancing public affairs causes. A 1994 survey of Fortune 100 firms revealed that the average Fortune 100 company belongs to 5.7 coalitions (The Pires Group).

The effectiveness of coalitions in helping special interest groups achieve public affairs goals has encouraged even more individuals, groups and organizations to look to coalition-building as a tool in their public affairs efforts (Rubinstein, 1987; Winkelman, 1989).

Unfortunately, some organizations have taken short cuts to coalition building that amount to trying to buy the results and manipulate the public rather than build relationships and involve the public and other groups in an above board fashion.

This quick-fix approach to coalition building was dubbed "Astroturf Lobbying" by then Treasury Secretary Lloyd Bentsen (Pires, 1994). Astroturf organizations are the "front" groups that imitate the legitimate grassroots coalitions that truly do speak for the broad base of individuals, groups or organizations they represent.

It is in the credibility ascribed to front groups that imitate coalitions that the potential danger to the policy making process lies. The public, media and policy makers accord coalitions high credibility ratings because they perceive involvement by a wide range of interested parties in the coalition. Implicit in coalitions is the notion of one voice that speaks for many. The public and public policy making organizations make decisions based on this ascribed credibility. If the public, the media and policy makers accept on its face the information and arguments of Astroturf coalitions as representative of the opinion and belief of a broad segment of the public, policy decisions

may be made that in effect represent the opinions and beliefs of a small segment.

Hence, these front organizations are a cause for ethical concern because a legitimate strategic communications tool of the public affairs industry (the coalition) is being misused. The public, legislative bodies, the communications industry, are all abused when unethical shortcuts are taken to form and operate coalitions.

Since public relations practitioners are increasingly involved in establishing coalitions and presenting them to the public, the media and to policy makers, ethical issues related to the practice of public relations, special interest groups and the use of coalitions also deserve consideration.

There are two major areas of concern with regard to the unethical use of the coalition technique. One relates to credibility of the public relations industry and to individual practitioners, and the other derives from the effect the deceptions perpetrated by front organizations may have on society as a whole.

The public relations industry has focused considerable attention on gaining professional stature. Ethical conduct represents a key baseline criterion for gaining professional stature (McKee, Nayman & Lattimore, 1975; Cutlip & Center, 1978; Newsom & Scott, 1993).

McKee, Nayman & Lattimore (1975) identify eight criteria for a profession, one of which is establishing a code of ethics. The Public Relations Society of America, which represents more than 16,000 public relations practitioners, adopted its first code of ethics in 1950. The International Association of Business Communicators, representing 12,500 communicators adopted its first code of ethics in 1985.

The argument has been made for a universal code of ethics, one which would apply to all practitioners and which would be promoted as a norm of operation, as a way to counter public perception that the industry is divided within itself on the subject of ethics (Hunt & Tirpock, 1993). Those opposed to a universal code argue that adherence to a code of conduct is for the most part voluntary, relying on practitioners to be ethical because they believe in themselves and desire the respect of the public (Wright, 1993). The discussion of ethical conduct by public relations practitioners is ongoing and frequently focuses on the need for reputation management to reside with individual practitioners rather than be mandated by a society code.

Considering that the 1994 U.S. Bureau of Labor Statistics records nearly 160,000 public relations professionals in America today, and the professional societies represent only a fraction of those, it would seem clear that professional organizations and formal codes aside, it is important for individual practitioners to be aware of ethical considerations and choose to conduct themselves, and counsel their employers, in ethical approaches to maintain the public trust.

"The real keepers of the reputation are those who practice public relations. If they do it well and honorably, there will some day come a time when the reputation issue will go away," commented Davis Young, Fellow, PRSA, a former chair of the PRSA ethics committee (Bovet, 1993).

Public opinion polls have shown serious erosion in public esteem for businesses and government (Newport & Saad, 1994). Pratt lists three reasons why this trend will have a significant impact on public relations:

- Public relations faces more ethical dilemmas, and practitioners are also seen as "trusted counselors;"

Public relations confronts gray areas of conduct where different approaches and responses to communications situations may arise, and

- While environment and social responsibility have greater emphasis as focal points for public relations actions, public relations still faces public demand for “morality, decency, accuracy, and professionalism in actions” (Pratt, 1994, p218).

Much of the ethical conflict lies in the advocacy role of public relations. Barney and Black (1994) liken our adversarial society to a court room. They defend the advocacy role of public relations as arguing a client’s case in the court of public opinion just as a lawyer does in a court of law. Public relations is not required to present all sides of an issue, they say, because the adversarial society assumes (but does not guarantee) that someone will rise up to argue the other side.

Englehardt and Evans (1994, p251) acknowledge that “the practice of public relations is prone to situations of deception and concealment” but emphasize the consideration of mitigating social, personal and political circumstances which may intervene. They stress focusing on avoiding harm to relationships as a guide to truth telling.

How the public relations industry addresses ethical issues will be the defining factor for the profession in the future (Pratt, 1994). Maintaining professional stature requires daily diligence. With public trust in corporations and the government eroding, those in the public relations profession (a profession which by definition acts in a mediator role between the organization the public relations practitioner represents and that organization’s publics) must stand firm on ethics to prevent further erosion and to help rebuild lost trust. In this light, tools such as coalitions, which

involve bringing together many constituencies, are a particularly important ground on which to take an ethical stand.

The lack of a singularly directed focus within the public relations industry with regard to ethics takes on special meaning when applied to special interest group operation and to the formation and utilization of coalitions to attain public affairs goals.

Listing ethical issues in public relations, Bovet included misinformation or dissemination of misleading information as a key problem (1993). Clearly, a "front" coalition disseminates misleading information and perhaps outright lies as well.

Tucker and McNerney advise that coalition participants must replace the win-lose mentality of members with one that's win-win. They say that mutual benefit is the ethical barometer of a good coalition. "True mutuality balances the interests of stakeholders and the public good" (1992, p28).

The PRSA Code of Professional Standards for the Practice of Public Relations includes articles that specifically say members shall "conduct ourselves professionally, with truth, accuracy, fairness, and responsibility to the public;" that members "shall not knowingly disseminate false or misleading information;" and that members "shall not use any individual or organization professing to serve or represent an announced cause, or professing to be independent or unbiased, but actually serving another or undisclosed interest" (PRSA Code of Professional Standards, 1988). The IABC Code of Ethics takes a broader based approach which provides "guidelines of professional behavior ... and focuses on helping individuals develop ethical decision-making skills independent of IABC policy" (IABC Code of Ethics, 1994). A more comprehensive discussion of these two codes as they apply to coalition activity is in Chapter Four.

Perhaps the larger ethical concern is the damage unethical coalition behavior does to individuals and to society. Bok contends that deception damages the human community as a whole (1989). She points out that lies misinform, obscuring the real objective of a communication or action; lies eliminate or obscure relevant alternatives; lies obscure accurate estimates of costs and benefits; they provide a degree of uncertainty in how we look at choices. All of these concerns can be applied to the unethical use of coalitions by special interest groups.

Yet, what constitutes a legitimate coalition effort? How can the public, the media and the governing bodies recognize a coalition that represents a broad grassroots section and one which has its base in 'Astroturf?' What guidelines should individuals, public relations professionals and organizations which wish to form or participate in a coalition follow to ensure that their efforts are effective and ethical?

Methodology

This study is designed to analyze the coalition efforts of a variety of organizations. In addition, media coverage of each of these coalitions will be analyzed. As an outcome of this analysis, the author will propose guidelines for use by public relations professionals, the media, governing bodies and the public for developing and evaluating ethical coalition-building efforts.

Four coalition efforts will be analyzed: the Coalition For Health Insurance Choices, Citizens For A Free Kuwait, the Clarke County Development Corp., and Citizens For Riverboat Gambling. The analysis will include interviews with organization principals; a comparison of the

operation of these coalitions to ethical standards proposed by professional communications organizations; and a review of media coverage of the four coalitions.

The interviews will address several areas of interest: the coalition's stated objective; who was approached to participate in the coalition and when; how the coalition was funded; how coalition members were involved in the coalition communication process; how the coalition communicated about membership to the public, policy makers and the media; and how the coalition perceived media coverage of coalition efforts.

The media selected for this evaluation represent the "elite" media in terms of coverage of these subjects. As Gans (1979) suggests, if the elite media cover a particular topic, it is likely that other media will cover the subject as well.¹ In addition, the media serve in a watchdog capacity for the public. If an organization is operating in a deceptive or misleading manner, it is relevant how quickly the media realize it and alert the public.

Articles will be evaluated to determine: how much coverage of each coalition there was; whether or not the media delved into the membership

¹ The definition of "elite" media has been expanded in this study to include the most prominent medium to cover each coalition. In the case of the Citizens For Riverboat Gambling and the Clarke County Development Corp. coalitions, this is the *Des Moines Register*. It is arguable that the *Register* leads coverage of issues by other Des Moines media. However; sometimes the other media in Des Moines will refuse to cover a subject first addressed by the *Register*. Only the *Register* coverage will be assessed on the gambling coalitions. Only coverage in the *New York Times* and *Washington Post* will be used to evaluate the other two coalitions.

and operation of the coalitions; how much influence the media reported each coalition having on policy making related to its stated purpose.

The four programs will be evaluated in the context of ethical guidelines established by the Public Relations Society of America Code of Professional Standards and the International Association of Business Communicators Code of Ethics.

Based on these evaluations, suggested guidelines for developing and/or evaluating coalition formation and operation will be presented.

Limitations

Two limitations to this study must be recognized. First, the coalitions are being evaluated based on interviews with public relations practitioners involved with each coalition. The information they provide is being analyzed on its face. The only check on the accuracy of this information was provided by the media coverage of these issues. In some cases (particularly the Citizens for a Free Kuwait) information provided by the interviewee conflicts with the generally understood objectives and actions of the group. Since the events are described by public relations representatives for each coalition, it is reasonable to expect that the best light (the "corporate line") will be placed on each group's actions. Also, the study is restricted by the amount of time which could be spent on each interview. In the case of Citizens for a Free Kuwait, significantly less time was available for interviewing the agency principal.

A second limitation relates to the media analysis. The articles analyzed were those listed in the indices for the publications. Since all articles citing each coalition were not listed in the respective indexes,

undoubtedly the media analysis is incomplete. While the media analysis is, as a result, not complete, the articles reviewed were seminal to the actions of the coalitions studied, according to the public relations principals.

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Chapter 3 -- Special Interest Groups: A Brief History of Grass Roots Impact

The United States of America was founded as a democracy, a form of government in which the power to govern rests with the people. The actual ability to make and change laws is vested in governing bodies which, theoretically at least, are representative of the people as a whole.

While the governments at local, state and national levels are responsible for law making, the people never give up their right to be involved in the legislative process through political organization and political expression (Emerson & Haber, 1952).

By law and by history, the rights of the individual in the United States carry great weight and are protected by the First Amendment rights of assembly and petition.

The idea of individuals of like mind banding together into special interest groups to advance their opinions before legislative bodies has a long history in the United States. Social activism, which seemed to rise up in the 1960s when events and social changes caused a ground swell of public interest group activity on such topics as the Vietnam War, civil rights, and abortion, really had its roots in America's founding (Lipset, 1986).

From colonial times on, activities that were handled in Europe by the state or state-financed organizations were taken over in the United States by volunteer organizations. Business leaders who had become financially sound began to support symphonies, universities and medical facilities. Volunteer religious groups took responsibility for social services. Early public/special interest groups addressed anti-slavery, feminism, environmentalism and individual rights.

At one extreme, the Boston Tea Party might be viewed as a colonial special interest group activity. On December 16, 1773, a group of Boston citizens, led by American patriot Samuel Adams, boarded ships and dumped the cargo of tea into Boston harbor to protest the British tax on tea.

The Revolutionary War-era Sons of Liberty represent a more formalized early special interest group. Organized by Samuel Adams and Paul Revere, the Sons of Liberty were highly active in promoting the policy agenda. They opposed the Stamp Act until it was repealed; formed the Committees of Correspondence to resist British economic and political actions and took part in convoking the Continental Congress (Funk & Wagnalls, 1979).

Issues of public interest to America's early citizens eventually generated special interest groups which remain influential today: the National Rifle Association was formed in 1871; the National Association for the Advancement of Colored People was established in 1909, and the American Civil Liberties Union became active in 1920.

The United States' unique political context with two houses and a presidency in which none of those involved is formally subject to party rule leaves the system particularly open to special interest group lobbying (Lipset).

Special interest groups have increased in popularity in recent decades. A content analysis of the 1986 edition of Public Interest Profiles found that special interest groups were growing in numbers, increasing their spheres of influence, doing more grassroots work and working with large budgets (Bergner, 1986).

The analysis found that 80 percent of the groups profiled operated at two to three levels: local, state, federal or international. Forty percent of the

groups had been formed in the 1970s and 20 percent had come into existence since 1980.

Grassroots organizations (the foundation for coalitions) had become highly sophisticated. Half of the organizations were doing grassroots work, up 20 percent from the previous edition of Public Interest Profiles.

The aggregate budget total of the non-profit, public interest organizations profiled was \$1.5 billion. Some 60 percent of the organizations had budgets in excess of \$1 million.

Non-profit public interest groups may be the first special interest groups to come to mind, but the for-profit sector is also active in the policy making arena. Frequently commercial interests operate through industry trade associations which, by their non-profit nature, are seen as more credible and public interest oriented.

A survey of Fortune 100 firms conducted by The Pires Group (1994) underscored the dollars for-profit corporations invest in advancing a public affairs agenda. The survey reported that ninety percent of these large companies spend at least \$1 million a year on public affairs, and that one-third have budgets of more than \$5 million.

Consumer-protection advocate Ralph Nader described three waves of public interest group activism in the 20th Century (Public Interest Profiles 1992-1993). The first reflected a rise in the populist-progressive movements which occurred in response to labor problems, urban squalor and exploitation by railroads and banks. Women's and black rights were issues as were civil liberties in general. As noted earlier, the ACLU and NAACP were established during this first wave.

The second wave arose out of the Great Depression and World War II. The Consumers Union and many social service organizations became active during this period, particularly in the cities.

The third wave occurred in the 1960's when civil rights, environmentalism, women's rights and consumer justice became issues. These movements resulted in the establishment of many government agencies expressly to handle these issues. One government organization established in response to the activism of the 1960s was the Environmental Protection Agency (EPA). The EPA was founded in 1970 to set standards for air quality, radiation levels, pesticides in food and waste disposal.

Nader suggests that these waves of special interest group activism seem to occur in 30 year cycles and that another wave may be ready to occur, aided by the increase in technology.

The level of special interest group activism changes in response to the current political scene (Rose, 1991). During the Carter administration, activists were in key government positions and the government involved itself in many areas, including product development, safety, advertising and pricing. It was preceding and during the Carter administration that Nader organized his Nader's Raiders, teams of lawyers, consumer specialists and students to conduct surveys of companies, federal agencies and the U.S. Congress analyzing how responsive they were to consumer interests.

President Reagan, on the other hand, adopted more of a "Let business be business," stance and opposed a federal government that overshadowed states' rights.

According to Douglas J. Bergner, then editor and executive director of the Foundation for Public Affairs, "The public interest movement, which was once a fringe element in the policy-making process, has matured and

developed a new professionalism. It is clear that the public interest movement is an established, ongoing, and very significant factor in the formation of public policy today. In very different fashion, and with often contrasting messages, public interest and public policy groups make government, business and the politicians act -- by raising issues and helping set the political agenda." (p16)

While activism was at a high point in the 1970s, it didn't disappear after that. Rather, organizers changed tactics and became more sophisticated in their methods and savvy about how business operates (Grover, 1989; Rose).

As special interest groups have become more adept at building extensive grassroots organizations and learning public relations techniques, they have increased their ability to effectively set the public affairs agenda.

An organized grassroots effort by California-based voters led to a revolt on insurance rates. Environmental groups have used guerrilla tactics to hinder logging operations. Animal rights groups' actions have made wearing fur coats less socially acceptable.

To increase their power, special interest groups frequently organize coalitions. By doing this, they increase the number of individuals for whom they speak and increase the perceived "public interest" credibility of their message.

Coalitions bring together credible opinion leaders representing various interests to find common ground and advance a mutually beneficial agenda. Their goal is to change or accelerate the direction an issue is taking in the policy arena (Tucker & McNerney, 1992).

The increase during the 1970s in legislation designed to address environmentalism and workplace safety concerns caused the first major

coalition unification of the business community itself. In 1972, a business coalition was formed to defeat legislation aimed at forming the Consumer Product Safety Commission (Rubinstein, 1987). The use of coalitions as a public affairs tool has become increasingly common.

The most effective coalitions are built over time by establishing relationships with like-minded constituents; they arise out of a strategic plan; and members agree on messages and a course of action (Tucker & McNerney; Newman, 1990).

In addition to coalitions, special interest groups have become adept at using other public relations techniques, particularly use of mass media.

Earth Islands used media advocacy in the form of a video news release distributed nationwide to raise the dolphin safe tuna issue. Even individual citizens have used the technique. Phil Sokolov, a man who suffered a heart attack, has made it a personal crusade to educate the public about the dangers of a high cholesterol diet. He placed full page ads in media including the *New York Times* and the *Washington Post* to urge food manufacturers to stop using saturated tropical oils.

The objective of media advocacy is to re-frame the problem from a concern of individuals to one of public policy.

The sophistication of special interest groups in framing an issue, and the way the media elect (or are guided?) to cover the issue is significant.

As Turk points out, "The world the public sees through the mass media's eyes is not a mirror image of reality ... The media's news window on the world is, instead, a reflection of the media's own construction of reality" (1986).

Turk adds that the sources of the informational raw material the media rely upon may be as influential in establishing the media agenda -- and by association the agenda of the public and policy makers -- as any other factor.

Special interest groups gain their credibility from the perception that they represent a broad base of individuals. Also, they are perceived to have no agenda other than the "public interest." However, implementation of the agenda of a particular SIG may or may not be in the best interest of the public as a whole.

As special interest groups have become more adept at their lobbying efforts, concern has arisen about whether they have too much influence on the policy making process. The 1995 Congress considered legislation called the Istook Nonprofit Gag Bill, which would have curbed lobbying by non-profit groups. Sponsored by the Republican party, critics say the legislation is designed to silence more Liberal opposition (Georges, 1995). Ultimately, the Lobbying Disclosure Act of 1995 was passed. This law substantially changed who must register to lobby and what information must be disclosed.

In response, non-profit organizations counter that they play a key role in society through service delivery, research, and public education. A position statement distributed by OMB Watch (OMB is the United State's government's Office of Management & Budget) and endorsed by public interest groups nationwide, stated that non-profit organizations provide "tremendous insight on public policy issues," that they comply with all restrictions on their lobbying efforts, and that the restrictions proposed by the Istook bill would "have a chilling impact on the democratic process as well as the rights of individuals and organizations to participate in public policy debates" (Lester, 1995).

To protect the public and policy making process, various restrictions have been placed on special interest group operations. Restrictions that currently restrict special interest group lobbying efforts are discussed in Chapter Five of this study.

Special interest groups have played a major role in policy making in the United States since the country's founding. They have increased their ability to influence the policy process in recent years by incorporating more public relations techniques, including coalitions and use of the mass media, in their methods of operation. As SIGS become more sophisticated in the use of these public relations techniques, the public, the media and policy makers should consider some areas of potential ethical concern.

One area of SIG operation to question is who provides the funding for a SIG/coalition effort? If a coalition is a truly broad based, grassroots initiative, then it is arguable that funding for the effort should be somewhat broad based as well. As Hunt points out: If one group or individual underwrites the cost, "... it's a safe bet that when the chips are down that entity or group will shape the action, position or agenda of the coalition" (Hunt, 1993, p108). But, how broad based does financial support have to be? All participants equally? Half? Is time spent on the project of equal value to dollars?

Another area for consideration is the extent to which the media are manipulated. Westley suggested that public interest is sustained and moved to higher levels by groups that organize around an issue and who, by their actions, catch and hold media attention. These groups "... demand center stage. The media cannot ignore 'what's happening,' even when it's being made to happen" (Westley, 1987, p47).

The guidelines suggested as a result of this study will take these ethical aspects into consideration. These areas may also be worthy of additional research.

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Chapter Four -- What Ethical Codes Say About Coalition Formation And Operation

The purpose of this chapter is to compare and contrast the articles of the Public Relations Society of America Professional Standards for the Practice of Public Relations and the principles of the International Association of Business Communicators Code of Ethics as they relate to special interest group formation and operation of coalitions. Copies of both the PRSA Standards and the IABC Code are in Appendix A.

A special interest group (SIG) is defined as any group, regardless of size, whose goal is to advance a specific topic on the policy making agenda. A coalition is a temporary alliance of various groups or individuals to achieve a mutually agreed upon goal.

There are more differences than similarities between the two codes, but one area of commonalty is that the codes address the conduct of individuals rather than the conduct of the public relations industry as a whole, public relations firms, or the organizations they represent. This is an important distinction because this approach places upon individuals the responsibility to ensure that SIGs or the coalitions operate in an ethical manner.

One of the more significant differences is that the PRSA Standards offer specific performance guidelines while the IABC Code offers general discussion points in four broad areas. In addition, because IABC is an organization for business communicators, the Code is less easily applied (and perhaps it should not be) to SIG coalition efforts which are forwarded by non-profit public interest groups, community groups or countries and states.

The PRSA Standards include several articles that may be specifically applied to SIG coalition formation and operation.

Overall, the PRSA Standards ask members to pledge to “conduct ourselves professionally, with truth, accuracy, fairness, and responsibility to the public.” This overriding pledge to responsibility to the public is underscored in several articles of the Standards, most specifically Article 1, which states that members should conduct their professional lives in accord with the public interest. Conducting one’s life in accord with the public interest is pertinent to public relations activities conducted by SIGs. However, defining just what an individual, organization or coalition must do to be “responsible to the public” is open to interpretation. The single-focused objective of most SIGs quite often means that their agenda may be at odds with the agenda of other individuals, organizations or coalitions. Coalitions promoting vegetarian diets will conflict with coalitions promoting meat consumption, for example. Yet the SIG’s belief in the “rightness” of their cause may blur their perspective of right courses of action. The individual interpretation of ethical action in these cases becomes critical.

Article 2 acknowledges that PRSA members hold a dual obligation to their clients/employers and to the democratic process. The article advises exemplifying high standards of honesty and integrity in honoring that dual obligation. This article presents challenge enough for the public relations practitioner serving one client/employer. It becomes increasingly difficult when an organization becomes part of a coalition. As part of a coalition, the SIG may be required to compromise its own goals to achieve the goals of the group. The public relations practitioner will be required to understand and accommodate the goals of not only his/her employer and the democratic process but also the goals of the coalition. Compromise may be particularly

difficult for single-focused SIGs, but former FTC Chairman Michael Pertschuk, who now heads the Advocacy Institute, believes that public interest groups can play a significant role in setting the public agenda if they're willing to seize the middle ground with timely compromise (Pertschuk, 1987).

PRSA articles 4 and 5 both address dedication to truth and dissemination of truthful information. Article 4 says members shall adhere to accuracy and truth. To reinforce this point, Article 5 says that members won't knowingly disseminate false or misleading information. Both of these articles pertain to SIG coalition activity. By their nature, coalitions present an image and information different from what would be presented individually by any coalition member. Coalition communicators must ensure that information disseminated is not false or misleading.

One segment of Article 6 advises that PRSA members shall not do anything that corrupts the processes of government. An Astroturf coalition, because of its inherent deceptiveness, may corrupt the processes of government by convincing policy making bodies to take action based on inaccurate or incomplete information.

Article 7, which addresses public disclosure of the client/employer on whose behalf a public communication is made, holds particular relevance for SIG coalitions. Coalitions are given names which are indicative of involvement by a larger group of individuals and organizations, names which include "citizens," "families," or "coalition." Many coalition communication materials do not identify the individual participating organizations or members. Article 7 advises that a coalition should make the names of its members known if asked. The larger issue, however, is how the public, media and policy makers are made aware of the coalition membership when

only the coalition name is included in communications such as mass media advertising. This has become more important as interest groups have become more adept at the use of mass media to advance social and public policy initiatives (Rose, 1991; Adams & Jennings, 1993).

In Article 8, members are advised not to use any individual or organization that professes to represent an announced cause but which, in fact, serves another, undisclosed, interest. To the extent that a front coalition is directed by a single individual or organization but purports to represent a larger pool of interests, the public relations people promoting the coalition are in violation of the PRSA Standards. One example to consider in the context of this Article is the National Heart Savers Association. Formed by Phil Sokolov to provide a vehicle to increase cholesterol consciousness, the National Heart Savers Association is 99 percent funded by Sokolov. The NHSA is the organization named as sponsoring advertisements. Yet the agenda is Sokolov's (Adams & Jennings, 1993).

Finally, Article 10 applies to public relations practitioners in the process of establishing a coalition. It advises that members shall not represent conflicting or competing interests without consent of all concerned based on a full disclosure of the facts. Since coalitions frequently require that members subjugate some of their own individual goals to accomplish the goals of the coalition, it's critical that all participants be aware of the interests of each member as the coalition is formed.

Where the PRSA Standards provide fairly specific guidelines for establishing and communicating by SIGs about coalition efforts, the IABC Code of Ethics states that it exists to inform and educate members to "help individuals develop ethical decision-making skills independent of the IABC policy." The IABC Code addresses conduct in four areas: Communication

and information dissemination; Standards of conduct; Confidentiality/Disclosure; and Professionalism.

In a general way, Article 1 provides a good guideline for all SIG efforts by encouraging communication professionals to uphold the dignity of the profession through honest, candid and timely communication.

Article 2 is also relevant to coalitions. It suggests that "Communicators should attempt to identify the source of information to be used." This may be interpreted to mean that communicators should identify the sources of information (members of the coalition) disseminating information.

Article 3 advises communications professionals to obey the spirit and letter of laws and regulations governing their professional activities. This would be relevant to SIG's lobbying efforts where regulations may vary at the state and federal levels of policy influencing. By association, Article 4 says that professionals will not condone illegal or unethical acts as related to their organization, its business or the public environment. This Article would apply to coalition development, operation and communication.

These guidelines from PRSA and IABC will provide the ethical context for evaluating specific SIG coalition efforts in this study.

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Chapter Five - Legal Restrictions On Special Interest Groups

A variety of state and federal regulations are in place to govern special interest group involvement in the policy making process. The Lobbying Disclosure Act of 1995 passed by the 104th U.S. Congress greatly expanded the definition of lobbyist and the scope of disclosure requirements at the federal level. On the state level, the rules vary somewhat from state to state, although there are consistencies since the state laws are derived from the federal precedent. This chapter examines the codes of the State of Iowa and the United States in comparison to the articles of the PRSA and IABC codes of ethics.

Interviews with Lynette A.F. Donner, legal counsel for the Iowa Ethics and Campaign Disclosure Board, and Wright Andrews, Esq., a Washington, D.C. attorney and lobbyist and president of the American League of Lobbyists, were conducted to identify trends in rule making and changes in the rules which may have resulted from actions taken by the coalitions studied in this thesis. Transcripts of these interviews are included in Appendix B.

The relevant articles of the PRSA and IABC codes are discussed in Chapter 4. Following is an abbreviated list of those articles:

- Conduct with truth, accuracy, fairness and responsibility to the public;
- High standards of honesty/integrity because members have a dual role of responsibility to clients and the democratic process;
- Dedication to truth and dissemination of truthful information;
- Do not corrupt the processes of government;
- Disclose identity of client/employer. Make members of groups known;
- Do not represent an undisclosed interest;

- Do not represent conflicting interests without full disclosure to all parties;
- Obey the spirit and letter of the law.

Code of the State of Iowa

The actions of special interest groups in Iowa are guided by two sections of the Iowa Code: the Iowa Campaign Disclosure - Income Tax Checkoff Act (mainly covering contributions to campaigns or ballot issues) and the Iowa Public Officials Act (mainly concerned with the actions of the state's executive branch). The Iowa Ethics and Campaign Disclosure Board (IECDB) is responsible for monitoring and enforcement of the code.

Disclosure is one of the main subjects covered by the Iowa Code and by the public relations codes. The Iowa Code requires, for instance, that the name and address for each contributor of \$25 or more for any ballot issue be reported [56.53b(11)] once the contributions total \$500 or more. The same information must be reported for in-kind contributors.

Disclosure also applies to political materials, solicitations and yard signs. These must include the name and address of those responsible for the materials.

If a committee or organized group, i.e. a coalition, is distributing the materials, only the name of the committee/coalition is required to be included on the materials. This is important since, while the contributors to a coalition would have been disclosed through the state's financial disclosure reporting process, unless someone checked with the Iowa Ethics and Campaign Disclosure Board, the only name they would be exposed to is the coalition name.

Iowa Ethics and Campaign Disclosure Board Legal Counsel Lynette Donner comments that the primary reason for the Board to exist is to track

how an individual or organization gets financing and how those dollars are used. She says that organized candidates and other political groups are well aware of the reporting requirements. It is mainly neighborhood groups that become involved for local economic development or personal reasons which do not comply with the code, failing to do so out of ignorance rather than intent.

A second area of focus in the Iowa Code and the public relations codes is actions with the potential to corrupt the channels of government. The restrictions are directed mainly toward public officials rather than at those who might try to influence them. Section 68B.5A places bans on certain lobbying activities. Bans are placed on public officials being involved in lobbying activities. Further, officials are banned from lobbying for two years after they leave office (68B.7). Other activities such as accepting or receiving gifts, honoraria and loans are also banned (68B.22).

Donner points out that these areas of the code were put in place in 1993 in response to concerns within the state about ethical conduct of the executive branch of government. The specific concerns were for members of the executive branch who left government office and immediately began lobbying the officials with whom they had worked and/or those who had conflicts of interest between their work for the state and their private businesses. It was in 1993 that the purview of the IECDB was expanded beyond campaign disclosure to include administrative ethics.

Donner points out that the laws continually become more detailed as the legislature reacts to specific situations. She suggests that ethics can be legislated when the issue is concrete and embodies an issue on which most people hold a common belief, since, in a sense all laws are a codification of

the morals of society. For instance, people generally believe killing is bad, so it's illegal.

A third aspect of the public relations codes addresses revealing who employs the public relations professional (a variation on the disclosure theme). Section 68B.36 of the Iowa Code requires lobbyists to register. They must disclose clients, contributions to candidates, receipt of campaign contributions and expenditures by the lobbyist. Beginning in 1994, the Iowa Code required lobbyists to report twice a year on those who paid them. As noted earlier, the objective is as Donner said, "to pierce the veil" of who funds a particular effort. Although the IECDB is responsible for enforcing the code, Donner reports that the Board doesn't actively seek information on the various groups. The Board most often finds out about unethical activity because some opposing group reports the activity to them. As noted in Chapter Six, opposition groups are also a means by which the media become aware of and begin reporting on coalitions. It is obviously important that the citizenry be alert, regardless of their support for or opposition to, special interest group activity.

A section of the Iowa Code particularly relevant to coalitions is 56.12, which stipulates that contributions given to political officials in the name of another are prohibited. Such contributions may not be given nor can such contributions be knowingly accepted. Again, the point of the Code is full disclosure and establishing a clear understanding of who is doing what and where the funds come from.

The Iowa Administrative Code (351) details a Lobbyist Code of Ethics. Three articles of that code are comparable to articles of the public relations codes. Two of these articles involve disclosure in one form or another, including: not lobbying until registered and not communicating in the name

of any fictitious person. The third article requires that lobbyists not deceive or attempt to deceive any public official. This last article is comparable to the PRSA and IABC code sections on being truthful and disseminating truthful information.

No laws were passed as a result of actions of the Citizens for Riverboat Gambling or the Clarke County Development Corporation. From Donner's perspective, disclosure was the primary issue in both of these cases. She said that there has been discussion of whether the state should limit how much a corporation can contribute to ballot issues. The question to be answered in arguing for or against legislation to cap corporate contributions would be whether or not these contributions corrupt the integrity of the electoral process. Donner said she's not sure a case could be made that corporate money has been able to change the underlying community opinion on an issue. In Polk County, Argosy gave all the money and lost, theoretically, because community opinion was opposed to the project. In Clarke County, Argosy gave all the money and the ballot issue passed, again theoretically because community opinion supported the project. In addition, while laws prevent corporate contributions to political candidate campaigns because ostensibly a candidate can be "bought" to gain ongoing influence, an issue is not something you can buy and achieve a position with lasting influence on the policy process.

Donner commented that the states' codes are derived from the federal laws. However, until 1995, the code of the State of Iowa was far more stringent in its disclosure requirements than was the law covering lobbying efforts at the federal level.

United States Lobbying Disclosure Act of 1995

The Lobbying Disclosure Act of 1995 was adopted based on the findings that: "responsible representative Government requires public awareness of the efforts of paid lobbyists;" that "existing lobbying disclosure statutes had been ineffective;" and that "effective public disclosure of the identity and extent of the efforts of paid lobbyists ... will increase public confidence" (Public Law 104-65).

The new Act was designed to disclose who was lobbying on what issues, on behalf of whom, and how much they were paid. Surprisingly, prior to the passage of this Act, lobbyists at the federal level did not have to disclose who was paying them, or how much, or which issues they were attempting to influence.

According to Wright Andrews of the American League of Lobbyists, the old law was unclear and unenforceable. The old law had been interpreted very narrowly by the Supreme Court so it did not have the depth it appeared to on its face. While the old law was meaningless as it was interpreted, Andrews reports that it took years of hearings and testimony to accomplish any change. Bills that would pass one house would not get past the other. He says the "trumped up" charges brought to defeat lobbying reform over the years were "one of the most scandalous things I've ever seen

While Andrews comments that the final legislation was cut back in many ways and some "gaping loopholes" remain, the Act speaks broadly to the issues and is fairly clear regarding who has to register and in requiring lobbyists to report what they were hired to work on; by whom, and how much they're getting paid.

These new requirements are highly relevant to coalitions. Under the old law, organizations could and often did ask their lobbyists not to reveal the organization's involvement. According to Andrews, de facto coalitions were formed in which a particular organization would provide significant funding through a trade association or coalition and be the primary player without policy maker or public awareness.

Coalition activity in Washington, D.C., has increased over the years, Andrews reports. While most coalitions are legitimate in the broad sense, he says some have been established as a cover for organizations that prefer not to be as visible on certain issues.

Two specific areas of the Act address coalition activity. Sec. [4(b)(3)(A)] stipulates that lobbyist registration must reveal the names of organizations other than the client who contribute more than \$10,000 toward lobbying activities and [4(b)(3)(b)] who in a major way plan, supervise or control lobbying activities. For instance, under the old law, the Coalition for Health Insurance Choices would have been the "client" of the lobbyists working for the Health Insurance Association of America. The Principal Financial Group, one of the primary funders of this coalition's activity and one involved in many policy decisions, would not have been listed in the lobbyist's disclosure statement. Under the new law, Principal's involvement and funding level would be revealed. Further, the lobbyist's registration must list (and the lobbyist must be willing to reveal if asked) the client's name, address and principal place of business and a general description of the client's business or activities [4(b)(2)].

The old law was in conflict with almost every article of the public relations codes. And while lobbyists are frequently lawyers and not public relations practitioners, the organizations represented often have public

relations people involved in strategy development. Further, enough lobbyists are public relations professionals to make these conflicts troublesome. The ethical dilemmas are almost too numerous to detail. Under the old law, it would be simple for coalitions to corrupt the processes of government since the identity of members was easily obscured. Lobbyists could easily represent conflicting interests without disclosing it to either party since if one wasn't obligated to reveal clients to policy makers, there would be no particular need to reveal that information to other clients either. It is only through full and open discussion of issues that the public and representatives of the public are served. The old law did anything but guarantee a full and open discussion.

The new Act, on the other hand, moves toward disclosure. Although loopholes remain, Andrews says the new Act goes a long way toward letting policy makers and the public be aware of who is trying to affect issues and how much they're paying to make it happen. This disclosure should help prevent corruption of the processes of government. Given the history of exceedingly narrow interpretation of the lobbying law, it will be interesting to see how the new Act is adhered to in actual practice. The public relations code advisory to obey both the spirit and the intent of the law is one which, at least at the federal level, is often ignored in response to political pressure.

One of the loopholes is allowing an exemption from registration to religious and grassroots groups. The argument in allowing this exemption is that these groups represent a broad membership; however Andrews comments that this is purely a political action and not necessarily grounded in logic. Religious groups may also find an exemption on the grounds of First Amendment protection.

According to Andrews, no specific coalition activity was responsible for the willingness of Congress to pass the new Act. The old law was widely recognized as inadequate and Congress finally took the necessary steps to change it.

Disclosure is the primary concern of the state and federal codes, and this is one of the most important elements for coalition formation, operation and interaction with the public. The PRSA and IABC codes of conduct also place heavy emphasis on operating in the sunshine.

While the code of the State of Iowa seems to be applied evenly to all individuals and organizations, the federal law allows exceptions for religious and grassroots organizations. This exception deserves continued scrutiny by Congress. To ensure that issues and ideas are exposed to full and open discussion, religious and grassroots organizations should also be subject to full disclosure.

References

- Iowa Campaign Disclosure -- Income Tax Checkoff Act and Iowa Public Officials Act, Iowa Code Chapters 56 and 68B, July 1995 printing.
- Iowa Administrative Code (351) Administrative Rules of the Iowa Ethics and Campaign Disclosure Board.
- Public Law 104-65, 104th Congress - December. 19, 1995. Lobbying Disclosure Act of 1995.

Chapter Six -- Four Coalitions: Case Analyses

The activities of four coalitions are discussed in this chapter. This study's goal is to identify common elements which may be constructed as ethical guidelines for other coalitions by analyzing who was involved; how the coalitions were structured; how participants in the coalitions perceived their own effectiveness; and ethical issues from each organization's own perspective.

The coalitions chosen for this study represent the broad range of circumstances in which the coalition technique is used. Two involve a corporation seeking to advance a local ballot issue; two are entities working at the national level: one is a trade association seeking to influence a national social issue; and the fourth is a foreign government interested in changing United States public opinion. The four coalitions studied are:

- Citizens for Riverboat Gambling;
- The Clarke County Development Corp.;
- Coalition for Health Insurance Choices, and
- Citizens for a Free Kuwait.

These case analyses are based on interviews with principal players with each coalition. In all cases, those interviewed were either employees of public relations firms retained by the coalition-sponsoring organizations or were public relations people on the staff of the coalition-sponsoring organization. As discussed in Chapters Two and Three, public relations professionals frequently are seen as ethically responsible for an organization's actions. Because of this, the actions of each coalition are also examined in light of relevant articles of the professional codes of the Public

Relations Society of America and the International Association of Business Communicators as identified in Chapter Four.

Methodology

In-depth interviews were conducted with principals involved in each coalition effort. Graham Gillette of Gordon James & Associates, the public relations agency retained by Argosy Gaming, was interviewed on January 25, 1996, on the activities of both the Citizens For Riverboat Gambling and the Clarke County Development Corp. Susan Neely, Senior Vice President, Director of Communications for the Health Insurance Association of America during the nation's health care debate, was interviewed on February 24, 1996, on the Coalition for Health Insurance Choices. Frank Mankiewicz, Vice Chairman of Hill & Knowlton, one of the public relations firms retained by the Government of Kuwait, was interviewed on March 6, 1996, on Citizens for a Free Kuwait activity.

An extensive list of questions was prepared. Both Gillette and Neely were interviewed using all of the questions. Each interview took from one and a half to two hours. Mankiewicz had more limited time available so the question list was shortened; the interview was completed in approximately 20 minutes.

The questions and answers from each interview are included in Appendix C. The interviews were not taped, but the answers are transcribed from detailed notes taken during the interviews. Interviewee comments which seemed particularly germane to the study were recorded as exact quotes and are indicated with quotation marks.

**Citizens For Riverboat Gambling/
Clarke County Development Corporation**

Iowa was the first state to pass legislation allowing riverboat gambling on navigable waterways. The legislation stipulates that before a gaming license can be issued by the Iowa Racing and Gaming Commission, the voters in the county(ies) where the riverboat would dock must pass a county referendum agreeing to allow this form of gambling in their county. Until 1993, all licenses had been granted to gaming companies who operated boats on the state's major border rivers, the Mississippi and the Missouri. The debate had continued about whether gambling boats could/should be allowed on lakes. In 1993, Argosy Gaming decided to try to make this happen.

Argosy Gaming and the company's public relations firm, Gordon James & Associates, were involved in two efforts to bring riverboat gambling projects to two central Iowa counties. In both cases, the stated objective was the same: to bring a new economic opportunity, including jobs and associated businesses, to the area. Both efforts used the coalition technique. A comparison of these two efforts reveals much about what can make a coalition effort succeed or fail.

In 1993, Argosy Gaming retained Gillette Graham of public relations firm Gordon James & Associates to help them in their bid to bring a riverboat casino project to Polk County, Iowa. Gaming companies frequently identify a target community; develop a project concept; present it for community leader approval, and use the fleshed-out project which has been given community leader blessing to gain voter support in the public referendum.

Argosy approached the Des Moines City Council with a proposal to site a gaming boat in Des Moines. According to Gillette, Argosy was encouraged to consider Greys Lake as a potential site. Argosy went so far as to purchase the land near Greys Lake and have an architect's rendering of the proposed project completed to help visualize their goal.

Whether Argosy was encouraged by the City Council to pursue the project or not is unclear. At least they were not discouraged from proceeding. Because the time between Argosy's initial contacts in the city and the referendum date was short (Argosy petitioned for a referendum vote in late August; the vote was held in early November), Argosy and Gillette elected to proceed with several actions at once. They contacted individual business leaders to explain the economic benefits of the project and to elicit their support; they developed a plan to pay off Polk County's debt on the Prairie Meadows race track (an \$89 million debt); and they developed an advertising campaign to take their message to the public. The ads were tagged: Sponsored by Citizens for Riverboat Gambling.

The production of the TV ads drew immediate media attention to the coalition effort. Questions were asked about who the "Citizens" were. It was revealed that there were only two citizens: Gillette and the owner of the public relations firm, Gordon James. Media attention also focused on the amount of money Argosy was putting into the effort - over \$200,000.

According to Gillette, the intent of the coalition was good; the execution was poor. In Polk County, coalition members were to be business and community leaders. The coalition wanted these leaders to say that from a business and a personal standpoint, the riverboat gambling project would be good for the area. The objective was to have these influencers buy in

and then sell the concept to the voters. However, Gillette says: "It ended up as a coalition of one."

The failure of the coalition to develop to an effective level may have been instrumental in the failure of the project. Key Polk County business leaders actively spoke out against the project. This appears to have dissuaded other business leaders, who had indicated support for the project in private, to decline to voice their support publicly. City Council members who may at one point have been privately supportive of the concept also withdrew public support. The referendum failed by a 60 percent to 40 percent vote.

A coalition was a key strategy in Argosy's Polk County effort, but Gillette believes it became a major negative. He says they wanted to use "citizens" in the name of the coalition because they were convinced they would have citizen involvement. But when they used the name without actually having citizen membership, "It turned out to be a huge negative."

"We clearly misused it (the coalition technique) in Polk County," said Gillette. They moved ahead with the coalition even though they didn't have members signed up because: "We felt we had to get a jump on the competition. We may have been successful if we'd had more time and had the coalition formed before it was announced. Maybe we could have been successful."

In other words, if there had really been a coalition, the Argosy effort may have been successful because, by definition, the effort would have represented a broad interest of the community. In fact, there was not a broad community interest and so calling the effort a coalition didn't make it

The issue of membership in the coalition became the ethical focus of discussion, with media coverage including commentary by Argosy's competition, state regulatory officials and reporters (Carlson, 1994).

The Argosy experience in Clarke County was substantially different and in many ways represented the learning that took place from the Polk County experience. An established group of business leaders -- the Clarke County Development Corporation (CCDC) -- contacted Argosy to work with them to bring a riverboat project to the county. Rather than Argosy taking the lead, the local business leaders led in all cases. Argosy provided technical information and financial support when it was appropriate.

Every effort was made to ensure that the Clarke County initiative was seen as locally led and locally controlled. There was no special coalition developed -- the existing organization was broad based, including a bi-partisan group of business leaders (heads of banks, local media), city officials and individuals. This group reached out to others, including legislators and county supervisors from surrounding counties to enlist their support. The group held informational/educational meetings for local citizens to present the plan. A logo and name, "Vote 4 the Boat," were designed by a local high school student.

The major ethical issue in Clarke County related to funding. All financial support for the Clarke County project was provided by Argosy Gaming. This decision was made consciously after much discussion.

Gillette said Clarke County leaders had decided that people knew the county had gone after Argosy and that the county wanted to work closely with Argosy to pass the ballot issue. "It was Argosy or nothing, so they didn't mind taking money from Argosy for the campaign." In addition, Gillette pointed out that the campaign in Clarke County cost less than the

Polk County campaign. Money was used to produce two direct mail pieces to send to everyone in the County and to produce a couple of radio spots and billboards. Television advertising was not used.

“It was obvious it was a community effort,” said Gillette. The direct mail pieces quoted people in the community, looked local, and didn’t come across as big money.

Nonetheless, how the funding was handled was a point of concern for the coalition in Clarke County. Gillette reports that great care was always taken to run dollars through the coalition, with a committee formed to file the required reports with county auditors. The CCDC made every effort to be above reproach.

Media Impact On Coalition Effectiveness.

The Citizens for Riverboat Gambling group intended to sign up members after the coalition went public. Gillette reports that conversations were continuing with potential members, and privately he had been told by some business leaders that they supported the project. However, after the coalition became a topic of public discussion via media coverage, these potential members refused to formalize the relationship. In addition, business leaders spoke out publicly against the project and their comments were reported in the media. This further discouraged potential members from signing up. The media, operating in its watchdog role, had a serious impact on the potential effectiveness of the coalition.

Ethical Issues: Conclusions.

The two Argosy coalition experiences reveal several possible points for ethical consideration. The first centers on how fully formed a coalition

needs to be before it becomes public. In the Citizens for Riverboat Gambling case, the public relations firm and Argosy determined that a coalition strategy was a good approach but didn't have any business or civic leaders or private citizens signed up before they began operating as though the coalition was a full-going entity. When the media reported that to only the two public relations practitioners comprised the coalition, the credibility of the effort was called immediately into question by opposition groups, policy makers and the media. Whether the coalition intended to be deceptive or not was irrelevant. It was perceived as having tried to deceive the public and immediately lost credibility.

By comparison, the Clarke County group included a broad bi-partisan base of business leaders and individuals. While the group's membership was discussed, it was always in the context of how the effort obviously had community support.

The second ethical discussion point is how the efforts were financed. Both were totally financed by Argosy. In both cases, Argosy and the public relations firm were careful to file all forms required under state laws, so the efforts were legally in compliance. However, being legally in compliance isn't enough in the eyes of many publics; being ethically "right" is also critical. Concern about the funding was focused in two areas: the amount of money spent and more significantly that it came from one corporation. The amount of money is probably indicative of what it costs to affect a ballot issue in today's media environment. The single source of funding, however, created the concern that Argosy was trying to buy the ballot. A broader base of funding would have carried the message that a wide range of people and organizations believed enough in the issue to put their money behind it.

While the Clarke County project was also funded solely by Argosy, the broad membership base overcame the concern. The conclusion that could be drawn from this discussion is that to be effective and maintain credibility, a coalition needs to have either broad membership which is seen as representative of the public interest or to have a broad base of funding. Having both would be preferable.

Finally, an ethical concern centers on the deceptiveness in naming the group. The name Citizens for Riverboat Gambling implies that there were citizens involved. Even when it became public knowledge that the coalition was made up only of members of the public relations firm, the group continued to operate under the coalition name; to tag their ads as sponsored by the coalition. The voters watching those ads, if they had not read the newspaper articles, could be led to believe the ads were funded by a group with broad citizen participation. This deceptiveness is damaging to the public trust and a dangerous path for the public relations profession.

Coalition for Health Insurance Choices

Elected in 1992, President Bill Clinton promised one of his administration's first actions would be major, national health care reform. First Lady Hillary Rodham Clinton led the charge to foster a national debate, to develop a reform plan, and to move this effort to fruition. Reform of the United States' health care system, as championed by the Clinton's, would have changed radically the way health care services, including health insurance, is managed in this country. The health insurance industry was greatly concerned about what this reform would mean to them. Further, the

insurance industry believed the Clinton plan would not be effective in its proposed form.

In 1992, the Health Insurance Association of America (HIAA), a national trade association whose membership included medium sized health insurance providers, launched a major effort to pass comprehensive health care reform at the federal level. They claimed that reform as they presented it would achieve health care that served everyone (and would be less damaging to HIAA members than the Clinton plan). One element of this health care plan would have been universal insurance coverage which would have been supported by an employer mandate. A major strategy in the HIAA effort was establishment of the Coalition for Health Insurance Choices (CHIC).

According to Susan Neely who was then Senior Vice President, Director of Communications for HIAA, the name for the coalition stemmed from the HIAA Vision, a document outlining the insurance industry's goal for health care reform. HIAA was opposed to the Clinton plan for regional purchasing plans. Research showed that people were concerned about lack of choice. Opinion research was used to test names and messages. "Choice" was a loaded word and became the key consideration in the name.

The intent in establishing the coalition was to involve a broad base of HIAA member companies, businesses and other groups and individuals who were interested in health care reform. Initially, HIAA staff were assigned to approach potential members, explain the goals of the effort and sign them up for support. Major coalition partners were listed on CHIC letterhead. The initial outreach was to groups which would be publicly supportive, "the Letterhead Committee." The credibility of these members was used to enlist support of others. After businesses and groups were enlisted, HIAA added

individual members to the coalition, mostly through responses to the 1-800# included in campaign advertising. Ultimately some 100 organizations and 43,000 individuals became CHIC members.

Each organization contacted was given a packet of information including the HIAA Vision in total and individual white papers on the key issues. They were asked to sign a card saying they agreed to be members. Each organization provided name, phone, FAX, and signature. The more than 430,000 individuals who responded to the advertising were sent a packet of information including letter writing points, bumper stickers, etc. The 43,000 who returned a card from the packet asking to be CHIC members were asked for similar identifying information. All were entered into a database. HIAA was scrupulous about getting and recording this information in case anyone asked, an action which served the organization well when the coalition came under media scrutiny.

There was no set target number of members for the coalition. For letterhead purposes, HIAA wanted to have 10 to 20 organizations who brought credibility. "To some degree it (membership size) is the quality," Neely said, rather than a specific number of organizations

Neely pointed out that there was difficulty from the outset in establishing a truly broad based coalition. HIAA was cut off from some natural allies because to gain support for universal coverage, businesses would have needed to support an employer mandate, and many didn't.

The CHIC plan of action called for ongoing activation of members to make contacts with Congress in Washington as well as with key members of Congress in their home districts. Neely said: "We built an arsenal of people. Then when we had an issue, we could activate them."

There were many examples of how members were activated. For instance, when issues such as mandatory alliances, spending limits or the specific Clinton Health Reform Plan were being discussed, Call-to-Action Alerts were sent to CHIC members. Between February and June 1993, these Alerts generated 46,081 letters and mailgrams to Congress and to key members of congress in their home districts. Calls-to-Action were sent for each relevant issue. Calls-to-Action were specific to CHIC member interests, i.e. mailings to small business members encouraged them to contact their Senators and express opposition to flat community ratings.

All funds for CHIC operation came from the parent organization, HIAA. The reason was that HIAA felt there were no other obvious sources of cash. They couldn't get the business groups with large financial bases to support the effort because these groups didn't agree with CHIC objectives. In addition, HIAA felt that because it was their members whose future was at stake, they should provide the funding.

HIAA determined that it was sufficient to have the other organizations and individuals involved as carriers of CHIC-supportive messages. An added advantage to being the sole source of funding, according to Neely, is that HIAA didn't have to involve other coalition members in the decision making process. However, Neely commented that single-source funding is not ideal because it affects the credibility of the coalition. In California, where HIAA mounted a state coalition effort, businesses and others did contribute. "We were adamant about (everyone contributing financially)," Neely said, even though she acknowledged that this made it harder to make decisions.

A key tactic in the HIAA campaign was a national television advertising campaign which took HIAA messages nationwide. The ads used two actors named Harry and Louise who portrayed middle-class Americans

talking about health care reform. In each ad they talked about one of the proposals the Clinton's were bringing forward and expressed the concern that "There has to be a better way."

At the outset, the decision was made to tag the "Harry & Louise" ads: "Sponsored by the Coalition for Health Insurance Choices. Primary funding by the Health Insurance Association of America." This helped organizational/coalition credibility when they came under media scrutiny since there was no deception about who was funding the effort. Focus group research conducted by HIAA showed that viewers of the ads were aware the insurance industry was paying for the ads.

While the coalition was used extensively in the HIAA campaign, Neely contends that as it evolved, it was not the driver it should have been. CHIC was not an optimum coalition in terms of media and policy maker credibility because it didn't have the big names on the letterhead. Inside the Beltway, CHIC was seen as being totally an HIAA initiative, not a broad based coalition. It was not the key part of the strategy it could have been from a Washington perspective.

HIAA focus group testing showed that CHIC was much more credible outside the Beltway and in the ads. In spite of this, HIAA decided to continue to use the coalition even inside the Beltway because with the citizens as members they felt they had enough of a base to be credible.

Neely remains an advocate of coalitions. "I would always use a coalition. It takes the initiative away from being that of an individual group or organization. It increases clout and credibility." Neely argues that the more people involved in a coalition, the greater the opportunity for the coalition to be effective in convincing policy makers.

Media Impact On Coalition Effectiveness.

Media attention played a significant role, positively and negatively, on the effectiveness of the HIAA coalition.

In October 1993, both the New York Times and the Washington Post ran articles reporting on an opposition group's accusation that CHIC was a front group for insurers. Neely commented that the Washington Post article created serious problems for HIAA and the coalition.

"At that point, any hope of making CHIC a more broad based coalition was lost," Neely said, because businesses were concerned about becoming allied with HIAA. "Based on (the adverse publicity), we considered dropping the coalition." However, because focus group research showed the coalition continued to be credible outside Washington, CHIC was retained.

The impact of the Post article on HIAA is underscored in Neely's comment: "We passed through the ring of fire and were never any better or worse than we said we were. But we were never what we could have been," because of the Post article.

On the positive side, the "Harry & Louise" television ads were a major strategy for HIAA to get its message out. In addition they were considered a public relations triumph by HIAA because of the massive amount of news coverage the ads generated. A news conference was held to introduce each new wave of advertising. HIAA and the ads gained even more visibility and credibility when the Clinton's did a parody of Harry and Louise during a Washington Gridiron event.

HIAA considered the bulk of this coverage to be highly positive. The ads generated far more news coverage of HIAA messages than they ever had imagined possible. The downside of the ads was that entertainment media

such as People magazine began to focus on Harry and Louis as real people rather than as actors. Managing these false activities kept HIAA from devoting full time and attention to the health care debate.

In spite of the impact media coverage had on HIAA's efforts, Neely commented that the media should play an even more aggressive role, particularly with advertising. While many media do "Ad Watch" columns which focus on truth in advertising, she suggested that the media don't do enough analysis of the coalitions sponsoring the ads and who's involved with the coalitions. "'Which citizens?' and 'Whose coalition?' are problems media should/could do a lot more with," she commented.

Ethical Issues: Conclusions.

Full disclosure was a major issue with HIAA's efforts. The organization's decisions to operate in the sunshine served it well. In forming the coalition, HIAA provided mission statements for the coalition and white papers on the issues. Potential members were required to sign papers indicating their support and desire to be a member. These steps protected HIAA and CHIC when the media scrutiny began. The television ads, which have great potential to obscure the real backers from viewers, were tagged not only with the coalition name but also with who provided the funding.

The full disclosure practiced by HIAA helped ensure the coalition remained strong internally and made it less open to attack from outside sources, including the media, policy makers and the public. Granted, some CHIC members did withdraw saying they did not understand what CHIC was really about. This underscores the need for ongoing full disclosure with members to ensure there is clear understanding about coalition goals and the tactics which will be used to achieve them.

As with the riverboat gambling coalitions, financing was also an ethical issue with CHIC. HIAA made a conscious decision to be the source of funding based on the association's member interest as well as to expedite decision making capability and ability to operate with speed. However, this decision left CHIC open to criticism from opposition groups.

Interestingly but not surprisingly, it was not the funding that concerned Washington, D.C., policy makers. Their concern was related to which other large organizations also supported CHIC's position. The coalition was not as effective as it could have been had other large organizations been involved, but it was deemed effective enough because of the extensive grassroots involvement. To a great extent, this goes to the definition of "coalition" as it exists inside the Beltway. Lobbyist Wright Andrews reports that policy makers in Washington perceive a trade association as a de facto coalition effort because the association represents many separate businesses and individual members.

Citizens for a Free Kuwait

The Persian Gulf War began in 1989 when Iraq invaded Kuwait. The attention of the world focused on the Middle East. The question debated worldwide was whether or not world powers should intervene. The United States, with oil interests in Kuwait and political interests in neighboring Israel, was embroiled in the debate domestically.

In 1989, a group of Kuwaiti students and ministers of the Kuwaiti government retained the Hill & Knowlton (H&K) public relations firm to help them influence American public opinion of Kuwait. Frank Mankiewicz, Vice Chairman of Hill & Knowlton, was involved in working with the

coalition Citizens for a Free Kuwait (CFK) in their efforts to position Kuwait in the minds of the American public.

According to Mankiewicz, the group of Kuwaiti students and government officials was already formed when they approached Hill & Knowlton for assistance. The group was composed of Kuwaiti students studying in the United States as well as Kuwaiti government officials, some of whom had been exiled before the Persian Gulf War, some of whom were in exile in the United States because of the war.

The Kuwaiti students had approached the Kuwaiti government officials for help because they felt they were suffering from the image of Kuwait as it was being portrayed in the media at that time. The government officials came up with the idea of developing a national organization and effort. The stated objective of the group, according to Mankiewicz, was to improve the image of Kuwait among the American public so that the Kuwaiti students living in the United States could feel better about themselves.

Since the group was already formed when it came to Hill & Knowlton, there was no discussion of numbers of members involved. Hill & Knowlton helped structure the group with a council made up of a few of the group's members who were ministers in the Kuwaiti government, the dean of a law school and former members of the Kuwaiti parliament. These individuals made the decisions and were the spokespeople.

Mankiewicz reported that his firm was retained to get media coverage of Citizens for a Free Kuwait members and activities. To do that, the firm orchestrated activities such as rallies on campuses and arranged interviews of CFK members. In addition, H&K and CFK were deeply involved in a variety of activities, including testimony to human rights commissions, which took place in Washington, D.C. and were directed to federal policy makers.

In spite of these activities to influence public opinion, Mankiewicz said that one of the ethical considerations for the coalition was that members wanted to be sure they were not seen as a group trying to affect U.S. policy. According to Mankiewicz, Citizens for a Free Kuwait was against U.S. force being used in their country. It was a matter of pride. They thought the economic sanctions against Iraq should be allowed to work.

Mankiewicz's comments about the stated objective of the group are often contradictory to the actions CFK undertook as well as to the generally understood reasons for the group's existence.

A widely publicized event that raised ethical concerns was the testimony by an eyewitness, "Nayirah," to a Senate Human Rights conference. According to Mankiewicz, the Senate asked the Citizens for a Free Kuwait for names of people who could testify at this conference. The Kuwaiti ambassador's daughter had been smuggled out of Kuwait and was prepared to testify about atrocities she had seen. The Ambassador asked Congressman Lantos not to give the girl's last name because the girl's family was afraid of reprisals against family members still in Kuwait. Lantos agreed. Mankiewicz said: "We thought this was a mistake but we were not in control. Then the girl testified that she had seen several instances in which Iraqi soldiers had taken babies out of incubators, left them on the floor, and taken the incubators. It turned out she'd only seen one such instance."

Media Impact On Coalition Effectiveness.

Media coverage was a factor for this coalition. The Hill & Knowlton directive was to gain widespread, positive coverage of Kuwait. Mankiewicz said the coalition felt that media coverage was pretty good overall, however he pointed to an editorial written by Harper's Magazine publisher, John R.

MacArthur, and published in The New York Times (1992) which he says reported inaccurately on many coalition activities. This article was the genesis of much of the adverse attention on the coalition and on Hill & Knowlton which was later picked up by other media.

The media also focused on the amount of money spent by the Kuwaitis on public relations firms. Mankiewicz said that he did not know if all members of the coalition contributed to coalition activity. Newspaper reports indicated funding was provided by wealthy Kuwaitis living in Europe (Lee, 1990).

In terms of effectiveness of the coalition, Mankiewicz also rated that as "Pretty good." He pointed to a long article in Time written by Michael Kramer that described Kuwait as a good country in a bad neighborhood (Kramer, 1990). Achieving that perspective of Kuwait by the media achieved H&K's goal.

Ethical Issues: Conclusions.

There are many ethical issues surrounding CFK and Hill & Knowlton. They ranged from disclosure issues (who were members of the coalition; what was their true goal; why weren't the names of those giving testimony revealed) to the amount of money spent on the campaign by the Kuwaitis.

One significant ethical issue may lie in the coalition concept itself. All coalitions are special interest groups. Not all special interest groups are coalitions. It is questionable whether Citizens for a Free Kuwait was in fact a coalition or if it was really a special interest group which had taken a coalition name and had sought to gain a coalition's credibility. While Mankiewicz claims the CFK goal was to create a positive impression of Kuwait with the American public, a significant share of the group's activities

were directed toward Washington policy makers. Deception of any public is a problem, but deception of policy makers who are deciding whether or not to send a nation into a war is even more serious. And, since federal policy makers are to be responsive to the interests of their constituencies, if the broader public has been deceived into being excessively concerned about the situation in Kuwait, that concern will be translated to the Washington scene. It creates a problematic domino effect.

Discussion

The coalition technique was used in these cases with varying degrees of success at accomplishing local, national and international public affairs agendas. Common points for discussion about the coalitions include: media coverage, operating guidelines, coalition naming, number of members and financial backing.

In all cases, the media played a role, although not always the same role. When the media reported on the membership make up of both the Citizens for Riverboat Gambling and the Coalition for Health Insurance Choices, both organizations were hindered in their efforts to attract additional members. The conclusion which may be drawn from this is that coalitions would be well advised to have a solid base of members on board before the coalition becomes a public entity since potential members may be swayed by the comments of critics and adverse to any media attention in which they may be singled out.

The media, because of its positive coverage of the Coalition for Health Insurance Choices "Harry & Louise" ads, the Citizens for a Free Kuwait, and

the Clarke County Development Corp., helped the coalitions accomplish their objectives of getting messages about their efforts to the broadest audiences.

While the media did focus on membership of the coalitions in all cases, it was for the most part a one article topic. Particularly when the coalition is using advertising, increased media scrutiny of the sponsoring coalition may be advisable.

None of the coalitions was established with any specific set of guidelines in mind. Some of the efforts were more sophisticated than others. The Health Insurance Association of America implemented a detailed plan for reaching possible coalition partners, including both businesses and individuals. The HIAA plan included sharing a great deal of information about the goals of the coalition. The intent to involve members widely was carried out.

Some efforts were very much a "learn as you go" process. The Citizens for Riverboat Gambling coalition intended to have business and community leaders as members and was holding meetings to enlist support, but allowed time pressures to take precedence in how decisions were made. There was not a good appreciation for what might happen if they went public with a "front" organization. There was rapid learning between Gillette's experience with Citizens for Riverboat Gambling in Polk County and the following opportunity with the Clarke County Development Corporation. In Clarke County, there was still no set of guidelines, but there were some principles of operation. These included letting the local group take the lead in making contacts, speaking to the media, and enlisting members.

The Citizens for a Free Kuwait coalition came to Hill & Knowlton more or less fully formed. Hill & Knowlton appears not to have concerned

itself much with the membership, funding or other aspects of the coalition. It is impossible to know whether more active participation on H&K's part in the structure of this coalition could have helped avoid some of the pitfalls the coalition encountered.

The names of the coalitions were conscious choices based on the desired message to be communicated. Focus group research led to including the word "choices" in the Coalition for Health Insurance Choices. The riverboat gambling coalition intended to imply that there were many citizens involved with their effort. The Clarke County Development Corporation name was left in place to reinforce that this was a locally driven effort. The Citizens for a Free Kuwait name could not be analyzed from the interview, but the implications of the name are clear.

Ensuring that the coalition delivers on the promise of the name would seem to be the prime directive. The media focused on membership of all of the coalitions but continued to report the story on the two coalitions -- Citizens for Riverboat Gambling and Citizens for a Free Kuwait -- where they seemed to feel the coalition was less than it was purported to be.

None of the coalitions was established with a specific number of members as the goal. The primary goal for three coalitions was having the first members be the major leaders/influencers. The Citizens for Riverboat Gambling was not successful in gaining support of business and community leaders and they failed. The Clarke County Development Corp. started out with a broad based, non-partisan group of business and community leaders. They were able to convince others to be supportive of their cause. They were successful.

The Coalition for Health Insurance Choices took some policy stands which excluded some business groups which would have been helpful to

their cause, but they had a position which resonated with many individuals throughout the United States. Because they were not able to get business groups involved, they were not seen as an effective coalition among Washington policy makers. But because they had such a broad individual member base, the coalition was effective outside Washington and even carried some weight with members of Congress.

It could be argued that the Citizens for a Free Kuwait was not an actual coalition but rather a small special interest group action. Because they named their group like a coalition, however, they carried some of the credibility of a coalition and were invited into the policy process in Washington. Numbers do not appear to be important. Who the members are, is.

Financial backing for the coalitions was a subject of media coverage and coalition organizer concern. The greatest concerns among the media were the amount of money being spent (did it seem like an inordinate amount?) and where the money was coming from (one special interest group?). The second concern seems the most legitimate. The first concern related to amount of money spent is more nebulous because of its relative nature.

Financial backing was also of concern to most of the coalition organizers. While it seems to be recognized that a broad base of financial backing would be desirable, there were trade offs including: ability to make decisions, time to find other backers, and who benefits from the coalition efforts, which seemed to mitigate the need to go beyond a single funding source. In all the cases studied, the coalition organizers opted to go with a single source of funding.

Compliance With Professional Ethical Codes

How well did these coalitions adhere to the articles from the codes of ethics of the Public Relations Society of America and International Association of Business Communicators which are applicable to coalition operation? Overall fairly well, with a few fine points to consider.

Article 2 of the PRSA code discusses the dual obligation PRSA members hold to their clients/employers and to the democratic process. This dual obligation becomes even more problematic in a coalition involving disparate members. By opting to have single funding sources, the coalition organizers eliminated some of the possible conflict because of the inherent understanding that the one who pays the bills makes the decisions. Nonetheless, there were still difficulties. In spite of the fact that HIAA provided extensive packages of information about the coalition's positions and objectives, some organizations, such as the Arthritis Foundation, pulled out after a while because they felt the coalition was not consistent with their interests.

PRSA Articles 4 and 5 address dedication to truth and dissemination of truthful information. Article 4 says members shall adhere to accuracy and truth. Article 5 says members won't knowingly disseminate false or misleading information. By "going public" with the Citizens for Riverboat Gambling coalition when there was not a broad base of citizen involvement, the coalition did knowingly disseminate false and misleading information. When asked by the media who constituted the membership, the spokespeople told the truth, but if the media had not asked, it is questionable whether the spokespeople would have made an open statement of membership. This point again reinforces the need for the coalition to have an effective membership before becoming public.

PRSA Article 8 may also have come into play with the Citizens for a Free Kuwait. This article advises members not to use any organization that professes to represent an announced cause which, in fact, serves another, undisclosed interest. The stated objective of the Kuwaiti group is at odds with the objective of the group as understood by many individuals and groups who have analyzed this case (Rowse, 1992; Roschwalb, 1994). To some extent it does defy logic that the Kuwaitis would pay up to \$11 million to public relations firms so that Kuwaiti students living in the United States could feel good about themselves.

PRSA Article 10 advising that members not represent conflicting or competing interests without consent of all concerned based on full disclosure of the facts also is relevant to HIAA's coalition. The HIAA organizers meticulously detailed the issues and objectives of the coalition. The nature of the issues prevented many business groups from joining the coalition. A fuller understanding of the issues as the coalition went into operation caused some organizations to withdraw. Clearly this subject is one which requires careful attention throughout a coalition's existence.

As noted in Chapter Four, the IABC code is more general, seeking only to provide guidelines to allow members to develop ethical decision making skills apart from the code.

Article 1 of the IABC code encourages professionals to uphold the dignity of the profession through honest, candid and timely communication. In the cases of the Citizens for Riverboat Gambling and Citizens for a Free Kuwait, "timely" is the critical issue. CRG's Gillette was candid and honest, but only after the deception had been discovered by the media. Timely communication would have indicated disclosure of membership before the group became public, or perhaps the group would never have been brought

to public view if it were not a legitimate coalition. CFK openly discussed the identity of the Ambassador's daughter only after the testimony had its desired effect. This delay created criticism and loss of credibility. It was also in conflict with Article 2 of the IABC code which suggests communicators identify sources of information. Intent to communicate in a timely manner could also guide which actions a coalition decides to take. It could prevent a front organization from coming into existence.

Article 3 advises obeying both the spirit and the letter of the law. All of the coalitions obeyed the letter of the law. The spirit of the law, particularly as it relates to disclosure, was problematic. Both CFK and CRG experienced disclosure shortcomings.

Both the Coalition for Health Insurance Choices and the Clarke County Development Corp. operated in compliance with the articles of the IABC code.

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Chapter Seven -- Coalition Media Coverage Analysis

This chapter analyzes media coverage of the coalitions by three “elite” media sources: The Des Moines Register, The New York Times and The Washington Post. It is a premise of this study that the media, serving in their watchdog role, have a responsibility to be aware of deceptive or misleading activity by coalitions and report on such activity to the public. Since coalitions are formed to impact a policy agenda, it is also worthwhile to know if the media report on the influence coalitions have on accomplishing the policy change.

Methodology

Both quantitative and qualitative methods were used to study media coverage of the four coalitions.

Quantitative measures included counting the number of articles published about the coalitions in media identified for the study. The total number of articles mentioning the organization which created the coalition was compared to the number of articles covering just the respective coalitions. Qualitative evaluation included reading each of the articles which mentioned the coalitions to identify message themes.

These media were chosen for study for three reasons. First, because at the respective state and national levels they are the media most likely to cover news about issues of public interest which may lead to public policy changes. Second, as “elite” media in their own venues, they are likely to lead other media in coverage of topics of public interest. Finally, while industry trade media such as Columbia Journalism Review or Public Relations Review would do greater analysis of the impact of the coalitions on the

policy debate or on the journalism and public relations professions, it is more important to understand what the general news media are covering since this coverage could lead to broader public understanding and discussion of important issues.

To assess the level of media interest in the Argosy Gaming coalitions in Polk and Clarke Counties in Iowa, a count was made of articles published in the Des Moines Register between January 1, 1994 and December 31, 1995 which mentioned Argosy Gaming and either Citizens For Riverboat Gambling or Clarke County Development Corporation. The articles analyzed were those included in the on-line database of The Des Moines Register held by the Drake University Cowles Library.

The Des Moines Register was selected because it is the largest newspaper in the state of Iowa, and as such, represents one of the state's "elite" media, the medium other media watch and frequently emulate.

A content analysis was done by reading each of the articles which mentioned either of these coalitions.

To assess the level of media interest in the Citizens for a Free Kuwait coalition, a count was made of the number of articles indexed in The New York Times Index and The Washington Post Index in 1990 and 1991, the time span covering the months preceding, during and following the Persian Gulf War. The search of The New York Times Index included the headings "Kuwait," "Middle East," and "Citizens for a Free Kuwait." The search of The Washington Post Index included the headings "Citizens for a Free Kuwait," "Kuwait," and "Persian Gulf Crisis."

A limited content analysis was conducted by scanning the entries in these categories in both indices. Articles which appeared from the limited content analysis to be relevant to the study were read in total.

To assess the level of media interest in the Coalition for Health Insurance Choices, a count was made of the number of articles indexed in The New York Times Index and The Washington Post Index in 1992, 1993 and 1994, the years following President Clinton's election during which the health care debate was the most heated at the national level. The search included articles under the headings "Health care," "Health Insurance Association of America," and "Coalition for Health Insurance Choices."

A similar, limited content analysis was conducted for these listings as was done for the Kuwait coalition.

The New York Times and The Washington Post were selected because they constitute the nation's elite media. It has been shown that if The New York Times covers an issue, other media are likely to cover the subject as well (Gans, 1980). The Washington Post is the newspaper most likely to cover issues under discussion by the United States Congress.

Findings -- Argosy: Citizens For Riverboat Gambling

From January 1, 1994 to December 31, 1994, 60 articles published in the Des Moines Register mentioned Argosy Gaming. Because Argosy Gaming Co is a publicly traded company, the Register routinely reports on a wide range of Argosy activities. Only those articles relating to the Polk County initiative were of interest to this study. A total of 14 articles reported on the coalition issue. Six of those articles mentioned Citizens for Riverboat Gambling. One of these six was eliminated from analysis because it referred to a similarly named, but unrelated, coalition group operating in Scott County, Iowa (see Figure 1).

Argosy Gaming's interest in Polk County as a casino site began to attract media interest in late August 1994. On August 26, Argosy is reported

to have called for a referendum vote on riverboat gambling in the November 8 election (Bowers, 1994). Various business leaders are quoted as opposing the idea of a casino boat in the City of Des Moines. On August 30, city officials acknowledged that they had discussed riverboat gambling projects with Argosy Gaming Co. and another group (Bowers, 1994).

Three articles in September present Argosy's proposal made public at a news conference; detail greater opposition by Des Moines business leaders; and report on Argosy officials' continued plans to meet with city leaders to gain support for the project.

The first mentions of Citizens for Riverboat Gambling occur in two articles published in October. The first article, on October 8, focuses on the production of TV advertisements which use actors to portray "just plain folks" who are supportive of riverboat gambling (Carlson, 1994).

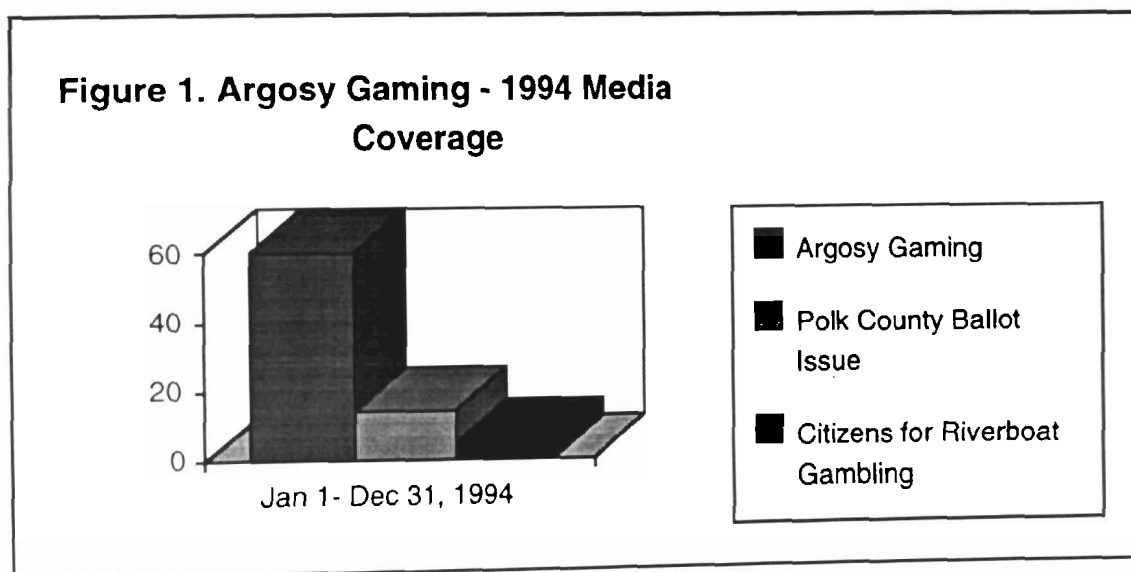


Figure 1. Comparison of media coverage of Argosy Gaming in the Des Moines Register in total in 1994 (60 clips) to clips on the riverboat gambling ballot issue (14 clips) and to clips which mention Citizens for Riverboat Gambling (5 clips) in the same year.

The article says: "The commercials actually are being sponsored by 'Citizens for Riverboat Gambling,' a political action committee organized by Argosy. Gillette (spokesperson for Argosy's public relations company) said members of the citizens group will be announced next week."

The second article, on October 20, focused specifically on the membership of the Citizens For Riverboat Gambling coalition. Spokespeople for the coalition acknowledge that there are just two of members of the coalition and that the entire campaign is being paid for by Argosy Gaming (Carlson, 1994).

The article says: "Actually, it seems to mark a fundamental change in the way public policy issues are promoted in the state of Iowa." While the article acknowledges that citizen groups are common, it goes on to say that members of the Argosy group "have not named a single supporter willing to be publicly identified with the issue."

Coalition spokesperson Gillette said: "I know that normally a group of people decide they are for or against something and they organize and form a committee and things move. That's not what happened in this case. We're not trying to deceive anybody. A citizens group didn't spring up."

The October 20 article quotes a representative of the Iowa Racing and Gaming Commission as being concerned with this coalition precedent. "It bothers me, not as a regulator but as a private citizen, when I see an organization with two members and a lot of money calling itself citizens for something or other. The perception is bad."

The Argosy coalition is also criticized by gambling opponent Rev. Carlos Jayne who says: "What these people are doing is wrong. This isn't good for the community. There ought to be a way to control this."

Another article on October 24 does not mention the coalition by name but reports on The Des Moines Register Metro Poll results. According to that article, "The public relations firm hired to promote a yes vote in the referendum has a deep hole to dig itself out of" as opposition to the referendum continues to increase, according to the poll (Fogarty, 1994).

Two articles in November mention Citizens For Riverboat Gambling. The first article, on November 3, reports that the coalition will spend more than \$200,000 in support of the referendum's passage (Bowers, 1994). On November 9, an article reports that the Polk County riverboat gambling referendum was voted down. The article reiterated the messages Argosy had used to position its offer but stated that Argosy had secured only one political endorsement and that the Citizens for Riverboat Gambling committee had consisted of only two people (Petroski, 1994).

Two other articles on November 1 and November 11 do not mention the coalition group but quote Argosy executives on their continued interest in Des Moines/Polk County as a project site and their surprise at the negative reception to the Argosy proposal (Petroski, 1994; Petroski, 1994).

A final article on December 20 reported that Citizens for Riverboat Gambling had spent \$235,000 to support the ballot initiative which failed by a 60 percent to 40 percent margin (Bowers, 1994).

Findings -- Argosy: Clarke County Development Corp. (CCDC)

From January 1, 1995 to December 31, 1995, 50 articles published in The Des Moines Register mentioned Argosy Gaming. Only those related to the Clarke County initiative were of interest to this study. A total of 13 articles reported on this issue. Five of those articles mentioned Clarke County Development Corp. (CCDC) (see Figure 2).

Argosy's presence in Clarke County was covered in two articles in January. The article on January 12 mentioned the CCDC as soliciting an Argosy proposal (Petroski, 1995). This article reported significant local support for the project, including a vote by the Osceola City Council to support the project. On January 17, a news item reported a three to nothing vote by the Clarke County Board of Supervisors to support the Argosy project (Dateline Iowa, 1995).

Five articles in February reported on the Argosy project; one of those mentioned the CCDC. On February 1, the report reiterates the local support for the project and states that local opposition is organizing (Petroski, 1995). On February 10, the article provided additional discussion of opposition to the riverboat and states that Argosy officials attended a series of town meetings to respond to questions (Petroski, 1995). The February 15 article reports on a "job fair" held to recruit job applicants for the riverboat

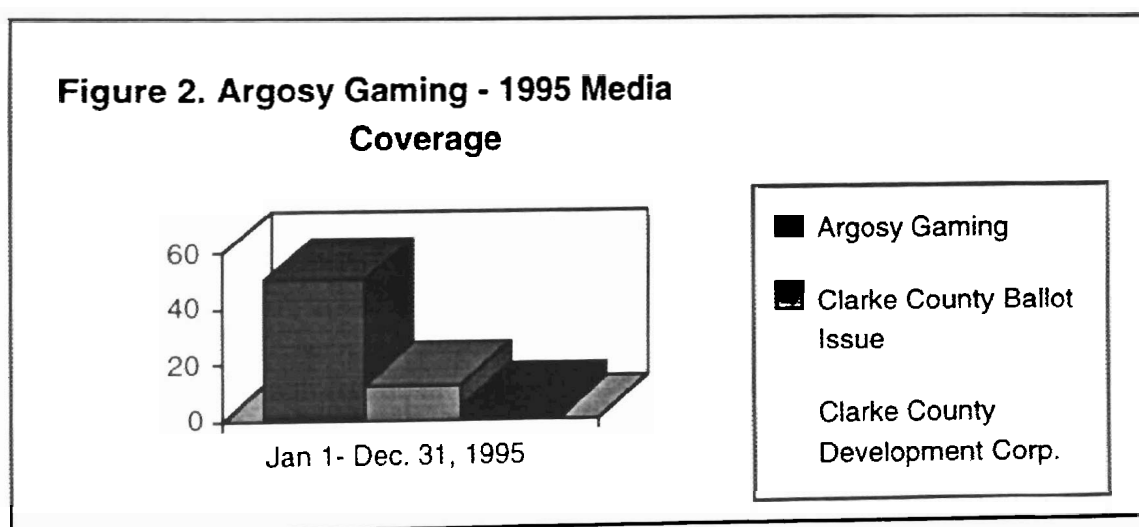


Figure 2. Comparison of media coverage of Argosy Gaming in the Des Moines Register in total in 1995 (50 clips) to clips on the Clarke County riverboat gambling ballot issue (13 clips) and to clips which mention Clarke County Development Corp. (5 clips) in the same year.

(Petroski, 1995). An article on February 24 reports that Argosy is providing all financial support to the Clarke County initiative. (Petroski, 1995) A local leader is quoted as saying that because of the short duration of the campaign, the local group had not had time to raise money, but, "This has definitely been grassroots from day one. We are running it locally. They are not calling the shots." The article also covers opposition concerns that the Argosy offer is too good to be true. The February 27 article leads with comments by a long time member of the CCDC who believes inviting Argosy to Clarke County was a good move. The article reports heated debate within the community (Petroski, 1995).

One article in March reports that the Clarke County referendum won by a wide, 69 percent to 31 percent margin, but notes that Argosy must still receive a gambling license from the Iowa Racing and Gaming Commission (IRGC) (Petroski, 1995). Opposition forces had begun a letter writing campaign. IRGC members are interviewed on their intentions. Argosy's president is quoted: "We've had a tremendous ground swell of support from the city and the county and from cities all around Osceola."

One article in June reports on concerns that the Osceola casino would be financially damaging to a Des Moines gambling operation (Petroski, 1995). A spokesperson for the CCDC reinforces the excitement Clarke County has for the Argosy project.

Four articles address the Clarke County/Argosy project in July. The first on July 19 expresses concerns of riverboat gambling supporters that the project may not receive an IRGC license (Petroski, 1995). A CCDC spokesperson reinforces what the project would mean to Clarke County in terms of jobs and economic development and stresses that there are plenty of gamblers to ensure success of both gambling operations. An article on July

21 reports that the Argosy license is turned down by the IRGC. On July 22, an IRGC member is quoted supporting the decision and the need for the state to be tougher on license approvals (Petroski, 1995). Argosy spokesperson says the company is considering a court appeal. The final article on July 31 is a letter to the editor saying the IRGC decision was a slap in the face to rural citizens of the state and the CCDC (Judge, 1995). The letter reinforced that the gambling initiative was initiated by the citizens of the county and not Argosy.

Findings -- Kuwait: Citizens For A Free Kuwait

There were no references to Citizens for a Free Kuwait in The New York Times Index in 1990 or 1991. There was extensive coverage -- 159 mentions in 1990 and 178 in 1991 -- of Kuwaiti government officials and their actions in the analyzed period.

There were no references to Citizens for a Free Kuwait in The Washington Post Index in 1990 or 1991 under the heading 'Citizens for a Free Kuwait' or 'Persian Gulf Crisis.' However, there were two articles in 1990 and two articles in 1991 which discussed the government of Kuwait's use of public relations firms. Both of these articles mentioned the Citizens group.

On November 29, the Post ran an article titled: "Kuwait's Campaign On the PR Front" (Lee, 1990) This article revealed that Kuwait had hired seven firms to work on its behalf, including Hill & Knowlton Inc. The article commented on the cost of the campaign and a spokesperson for the Citizens for a Free Kuwait said that "most of its funds come from wealthy Kuwaitis who are in exile in Western Europe."

A second article published on December 19 was titled "Kuwaitis Pay \$5.6 Million to Publicity Firm" (Lee, 1990). This article detailed how the money was being spent and reiterated that the source of the funds was "wealthy Kuwaitis in Europe."

In this article Rep. James A. Hayes (D-La.) was quoted as saying: "It's a ridiculous sum of money no matter what you think of the cause. I resent that on an issue that should be decided by information from experts so much is being spent to influence me and the American public. This serious cause is being advertised like T-shirts or basketball shoes. That's immoral."

One of the articles published in 1991 mentioned the efforts of Citizens for a Free Kuwait.

Published on March 17, the article was titled: "The Selling of Kuwait Moves Into New Phase" (Lee, 1991). This article discussed the strategies used to focus public opinion away from unfavorable aspects of the Kuwait government and on those aspects of the Persian Gulf conflict which would garner public support. The amounts of money spent on various tactics of the campaign were detailed. The article pointed out: "Kuwait's efforts were a case study in the way that foreign regimes with ample stocks of money and ingenuity can influence public opinion."

The last article, published on June 5, was titled "Kuwaitis Paid for Moshbacher Trip" (Auerbach, 1991). This article detailed how the government of Kuwait had spent almost \$67,000 to fly then-Commerce Secretary Moshbacher and several aides to Kuwait "as part of a major public relations effort to show Americans how the country was devastated by the Persian Gulf War."

Mosbacher's trip was reported by the Commerce Department in a filing with the Office of Government Ethics under regulations on the use of nonfederal funds for travel.

Findings -- Health Insurance Association of America: Coalition for Health Insurance Choices

There were no references to the Coalition for Health Insurance Choices (CHIC) under the headings 'Coalition for Health Insurance Choices,' 'Health Insurance Association of America,' or 'Medicine & Health' in The New York Times Index in any of the three years scanned. There were eight mentions of the Health Insurance Association of America (HIAA) in 1992; four mentions of HIAA in 1993, and eight mentions of HIAA in 1994.

While CHIC was not mentioned in the index headings, the article published on October 20, 1993, did reference the coalition in the copy. This article was titled: "Coalition Opposing Health Plan Is Called Front Group for Insurers" (Hilts, 1993). The article detailed the accusations by a consumer group, the Families USA Foundation, against the HIAA coalition. They said: "the health insurance industry is masquerading in favor of some kind of health care reform when, in fact, its objective is to tear the guts out of the Administrations' reform proposal." The article discussed various aspects of the HIAA plans to influence members of Congress.

HIAA spokesperson Charles N. Kahn responded: "I don't think this is a big deal. Everyone has plans like this. Families USA is trying to make it look like we're doing something un-American. I think that is outrageous. It's McCarthyism."

Further, Families USA claimed the HIAA coalition purports to be a broad-based coalition but in fact is a small number of individuals, a quarter

of whom were employees or dependents of one insurance company. The article noted that three groups had resigned from CHIC because “they had joined the coalition without being aware it might be run by the insurance lobby.”

Kahn defended the coalition saying that CHIC membership had grown substantially. He said: “The members of this coalition are citizens, many of them are people who work in the insurance industry, but they have a right to advocate their position even if they don’t agree with Families USA.”

There was one reference to CHIC in The Washington Post Index in the three years scanned. This article was published on October 20, 1993, and reported on the Families USA attack on the HIAA coalition (Weisskopf, 1993).

Ronald F. Pollack, executive director of Families USA, was quoted as saying, “Once you use deceptive and dummy coalitions, falsely advertise and spend megabucks to defeat health reform, that is deceitful and unethical.”

The Post article reported that “HIAA has been careful to name itself as the coalition’s financial backer in the fine print of brochures and ads, and most of the tactics laid out in its ‘vision plan’ are staples of industry groups gearing up for big legislative bouts.”

HIAA was mentioned in one article in 1992; three articles in 1993, and five articles in the first three quarters of 1994. All but one of these articles addressed HIAA’s highly visible and controversial “Harry and Louise” advertising campaign opposing the Administration’s health care reform plan.

Discussion

The content analysis showed that the media performed to some extent in line with the premises of the study. There was a greater tendency for the media to serve as watchdogs, informing the public of the coalitions as entities. The media were less likely to draw a direct connection between the actions of the coalitions and a change in policy. The content analysis raised several other points that will be discussed here.

First, did the media cover the coalitions as entities, thereby performing in a watchdog roll for the public? All four coalitions received varying degrees of media attention. Media coverage focused predominately on three areas: funding for the coalitions, membership composition, and the public relations tactics used to influence opinion.

Discussion: Argosy Gaming/Riverboat Gambling Coalitions.

The Des Moines Register covered both of the coalitions with which Argosy Gaming was involved. Comparatively speaking, the Register gave more coverage to the Argosy coalitions than the Times and the Post did to the Kuwait and HIAA-led efforts. It is likely this is because gambling has been a subject of great local interest and the Register's purview is local.

In the Register coverage, particular emphasis was placed on the fact that Argosy Gaming was providing all of the funding for both coalitions. In addition, with respect to the Polk County initiative, emphasis was given to there only being two members of the Citizens group. It was the perception of broader involvement created by the "Citizens" name conflicting with the reality of only two hired members which raised the ethical concerns of regulators and the opposition and prompted the Register to comment that this marked a fundamental a change in the way activities like this are handled.

No particular point was made of membership in the Clarke County Development Corp. although spokespeople for the CCDC repeatedly emphasized the broad, grassroots, community support for the project. Perhaps CCDC stressed this message because of the negative reaction to Citizens for Riverboat Gambling having only two members. Perhaps the Polk County experience prompted the media to dig more for who was behind the CCDC group. This study cannot determine the causal relationship, but whatever the cause, the result was media coverage that gave the public a better view of who was behind the CCDC effort from the outset.

Discussion: Kuwait/Citizens for a Free Kuwait.

Since The New York Times did not cover Citizens for a Free Kuwait activity, per se, it did not perform the media's watchdog function with regard to this coalition. Since there was heavy activity directed by the coalition to the media, it is difficult to understand why the Times didn't do some coverage of the coalition as an entity. It is possible that the Times Index did not have the articles indexed so they could be identified by this analysis. It is also possible, although less likely in this researcher's opinion, that the Times did not react to the emphasis that was being placed on gaining the paper's coverage of positive Kuwaiti messages. A third possibility is that the Times reporters saw these activities (as the Post mentioned in their article on the HIAA coalition effort) as what one would expect in the lobbying effort of any powerful, well funded organization. This study does not allow for selecting one conclusion over another. But all could be worthy of further study.

The Washington Post covered the Citizens for a Free Kuwait fairly extensively in the two articles analyzed. The reporter outlined the objective

of hiring a public relations firm; detailed some of the tactics and messages used; discussed both the amount of money spent by Kuwait in hiring public relations firms to support their agenda, and re-iterated that the coalition membership was comprised predominantly of a few wealthy Kuwaiti leaders.

One possible conclusion is that the Post focused attention on these activities because Kuwait was working to influence the U.S. government to support armed intervention, and the Post covers Washington, D.C. as a 'local' market much as The Des Moines Register covers Des Moines as a local market. Or, of course, it is possible that the Post simply did a better job as a watchdog.

Discussion: HIAA/Coalition for Health Insurance Choices.

The Post and the Times gave limited coverage to the HIAA Coalition for Health Insurance Choices. The coverage of this coalition was generated by an attack by another coalition group with opposing views. The coverage included discussion of how broad-based CHIC membership was. In addition, the techniques used to influence public opinion were discussed because this information had become available through an HIAA planning document which Families USA had obtained.

The bulk of the media coverage of HIAA focused on the "Harry and Louise" ads. The "Harry and Louise" advertising concept involved having two actors portray a middle-class couple talking about health reform. In each ad they expressed concern that health reform be done properly. This advertising campaign became a cornerstone of the HIAA effort, with each new series of ads announced at a news conference and publicized widely. The HIAA ads carried the tag line: "Sponsored by the Coalition for Health Insurance Choices." However, there was no particular connection made

between the public relations plan and the TV ads in either the Post or the Times articles. The Families USA group did lump the ads into their overall concern about CHIC.

Both Hilts' and Weisskopf's articles reported on the HIAA plans to target 17 key members of Congress; attend town hall meetings; prepare spokespeople; and get news releases to newspapers.

Ronald F. Pollack, executive director for Families USA, was quoted in Weisskopf's article as saying: "Once you use deceptive and dummy coalitions, falsely advertise and spend megabucks to defeat health reform, that is deceitful and unethical."

HIAA's Charles N. Kahn, III, responded: "We have been perfectly up front with the coalition, and we are simply taking our message to the people. Ron Pollack has decided to attack us because he's unwilling or unable to discuss the issues."

Weisskopf said the HIAA plan "offers a glimpse into the lobbying strategy of a powerful industry group." This comment did not ascribe any indictment of ethical problems or illegality to the HIAA plan. Again, the media may not have covered this coalition more extensively because in their view the actions were nothing other than would be expected by a large industry lobbying group. In fact, Weisskopf noted that Families USA's publicizing of the HIAA plan "illustrates another favorite tactic of lobbyists: counter intelligence to discredit the enemy."

In summary, the media covered the "news" about the coalitions. The "news" being the "who," "what," "when," "where," and to some extent "why" of what's occurring in society. The media in this study did not editorialize on the rightness or wrongness of the coalition actions, rather they reported only on what happened. When questionable actions such as a

skewed membership or an imbalance in funding sources were discovered, these messages tended to be repeated in subsequent coverage of the coalition. When questionable ethical practices were uncovered, as in the cases of the Citizens for Riverboat Gambling and the Citizens for a Free Kuwait, the media pursued more extensive coverage of the organization's activities, however, again, they did not editorialize on or analyze these activities beyond reporting the news.

The second premise analyzed was whether or not the media reported on each coalition's impact on the policy making process.

With regard to three of the coalitions studied, the media did not draw a direct correlation between the coalition's activity and the change, or lack of change, in policy. The exception was Citizens for a Free Kuwait. For the other three coalitions, the media coverage did indicate that the policy making objective was achieved. For instance, the media reported on how many groups were supportive of the Clarke County gambling referendum passage. And the media reported that the referendum passed. They did not say one happened because of the other. Documents provided by HIAA, as well as media coverage, indicated that the HIAA Harry and Louise TV ads (sponsored by CHIC) created enough controversy that the White House offered concessions in the health care debate to get HIAA to stop running the ads (New York Times, 1994; Vision & Advocacy Highlights, 1994). The media did not report that the policy direction was changed specifically because of CHIC.

Lack of media attention to the HIAA campaign by media Ad Watch columns was noted by West, Heith and Goodwin (1995). They reported that almost no Ad Watches assessed the accuracy of the health care spots -- only four in the New York Times from Fall 1993 to Summer 1994. They report

that this lack of attentiveness was acknowledged by Washington Post columnist David Broder who conceded “that the news media had failed seriously to challenge the accuracy of health care advertisements.”

With the Citizens for a Free Kuwait, however, The Washington Post did draw relationships between actions taken by the coalition and changes in opinion. To combat Kuwait’s image problem, press briefings with Kuwaiti leaders were organized. A survey of cities in eleven countries worldwide was conducted to show that the United States was not alone in supporting Kuwait. Testimony was organized for a congressional hearing. A Kuwaiti spokesperson said, “After that, we started getting a lot of good press and calls from volunteers” (Lee, 1990).

In addition to the questions of the media as watchdog and reporting on policy making impact, there were several other observations to be made based on the content analysis.

One point particularly relevant to this study is that, for the most part, the media coverage seemed to focus on the public relations firms that were involved rather than the companies/associations/countries that sponsored the activity. The public relations tactics were called into question.

As noted earlier, The Des Moines Register commented that the public relations firm that had been hired had a deep hole to dig out of, not that Argosy had a deep hole to dig out from. The media questioned the public relations firm’s actions, not Argosy’s.

In Lee’s article of March 17, 1991, about the dollars spent by Kuwait on public relations activities, it is noted that Hill & Knowlton was “one of the public relations companies that marshaled Kuwait’s campaign in the beginning but was removed from the account after a wave of negative news about Kuwait began to set in.” Kuwait did not cease their efforts to change

public opinion; they simply changed public relations firms. In fact, a spokesperson for Hill & Knowlton said: "Now every American knows where Kuwait is. I guess that means that we did our job well."

The conclusion that may be drawn from this is that the credibility of specific public relations firms and the public relations profession as a whole suffers from deceptive and unethical behavior. Can it be that because the public relations firms are "hired guns," the funding sources escape direct scrutiny? If that is so, then public relations firms need to hold even more diligently to their dual position -- operating in their client's interest and operating in the public interest -- serving as the ethical conscience.

Another point for consideration is which publics coalition efforts target. Ultimately, the coalitions wish to change policy in some way. They undertake agenda building tactics that involve media coverage but are not wholly dependent on the media. With the gambling coalitions, the public had to be convinced and they were swayed by influencer opinions, including the opinions of key business leaders. Some of the public were probably swayed by the media coverage in the Register. Even more it was probably swayed by neighborhood and workplace discussions and personal opinions and attitudes toward gambling. To get the United States involved in the Persian Gulf, Congress had to be convinced the American and world "public" was supportive so opinion studies were conducted and publicized. Well known individuals were involved in the process, i.e. the Kuwaiti ambassador's daughter who testified to Congress. Agenda building activities involve various publics on many levels. The media are one element.

Coming full circle, as the designated watchdogs for the public (the public including policy making bodies), the media play a critical role in monitoring/revealing the activities of coalitions so the public is not misled. It

might be argued that the media should check out membership and backing of any powerful coalitions as an ongoing responsibility.

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Chapter Eight - Conclusions, Guidelines For Coalition Operation, Recommendations For Further Study

Research completed; findings analyzed. What conclusions can be drawn? What guidelines can be put forward for establishing, operating and evaluating coalitions? What loose ends can be identified for possible additional research?

Conclusions

Several conclusions have arisen from analysis of the composite findings of this research.

The coalition technique is increasingly seen as an effective way for special interest groups to gain credibility and "voice" with the public and policy makers. Forming coalitions has become more common as organizations have come to understand the dollars required to effectively lobby at the state and federal levels or to effectively influence ballot issues. Additionally, coalitions bring together enough organizations and individuals that policy makers will pay attention.

Coalitions can be an effective tool to advance the public policy agenda. If they involve a broad base of organizations and represent the grass roots, they can effectively operate in the public interest at both the state and federal levels. At least they can represent the interests of a sizable portion of the public since it is unlikely that any special interest group (by definition) or coalition could represent the interest of all of the public. Therefore it is critical when faced with a coalition effort that the public, media and policy makers ask, "Whose public interest?"

For the most part, coalitions do not set out to deceive. They perform a legitimate function in the public agenda building process. However, when coalitions are formed which do not operate with full disclosure, when they do not have a clear governance system established, when they have a single source of funding, the potential increases for the coalition to be seen by all audiences as deceptive. Wright Andrews of the American League of Lobbyists cautions that coalitions are sometimes used by an organization to hide behind. When an organization has “gone to the well” too often with a particular member of Congress or Congressional committee, a coalition allows the organization to advance an issue with a larger group carrying the message as opposed to having to do it themselves. The new federal Lobbying Disclosure Act of 1995 should help ensure that these coalition members do not go totally unnoticed.

The general public appears to be at greater risk of being deceived than Washington, D.C. policy makers. First, this is because those involved in the federal process are more familiar with special interest group and coalition tactics and operation since they experience these entities on a day-to-day basis. They interface with the organizers and members of coalitions, frequently in person. While this is no guarantee that they will not be deceived, the frequent and personal interaction with the players makes it less likely. Second, by comparison, the general public is less familiar with coalition operation and more likely to be exposed to coalitions in name only, via mass media advertising or through campaign literature. Unless the public is particularly attentive or takes it upon themselves to probe further, when they see an advertisement or receive a call for support from an organization with a name such as “Coalition for a Competitive Long Distance Service,” they are likely to agree with or support the effort on its face. After all, who

could disagree with an organization which espouses something so obviously in the public interest? Because of the effectiveness of mass media advertising to rouse public interest in issues, it may be necessary for this type of advertising to be regulated further to ensure truth in advertising. The Health Insurance Association of America tagged the Harry & Louise ads as sponsored by the coalition but also added that primary funding was provided by the insurance industry. HIAA research confirmed that viewers of the ads picked up on this message. Most coalitions do not take this cautionary step. Perhaps they should.

Full and timely disclosure of financing and membership are the two areas of coalition operation which are most likely to cause concern among the public, policy makers and the media. Coalitions that are the most careful first in fully communicating with members and second in communicating with audiences outside the coalition are the most likely to maintain credibility.

Financial backing is one of the greatest common areas of concern for all publics. Broad based funding is preferable since it creates a vested interest and participatory decision making for many players. Single source funding draws attention and concern about who is calling the shots and how the decisions are being made. All four coalitions studied in this research were funded by single entities. Three of them experienced the critical scrutiny of policy makers, media and the public because of the impression this funding arrangement caused. Only the Clarke County Development Corp. escaped criticism because of the widespread community support for the espoused project.

Legal restrictions on special interest groups and coalitions are continually refined in response to the ethical concerns of the public and

policy makers. However, the interpretation of the laws is affected by how narrowly or broadly the courts interpret the laws and by how effective various political and special interests were in influencing the crafting of the laws at the outset. The new federal Lobbying Disclosure Act of 1995 is a classic example. In the month since the research for Chapter Five of this thesis was completed, Wright Andrews reports that the Act has gone through two interpretations by Senate and House committees which have given new guidance to those who must operate under this law. In general, the laws can only provide guidelines for conduct. They cannot replace an ethical approach to coalition formation and operation by public relations practitioners. Both legal and ethical operation are important.

The media have a watchdog role to play with regard to alerting the public to unethical coalition activity. In three of the cases researched, the media performed in a watchdog capacity and had a significant impact on the coalitions. According to coalition organizers, media coverage of both the Citizens for Riverboat Gambling and the Coalition for Health Insurance Choices prevented them from attracting the broad base of influential members they had originally intended. Media coverage caused the focus to turn from the goals of the Citizens for a Free Kuwait toward the unethical practices of the coalition's public relations firm. In the fourth case, the media reported on the membership and funding of the Clarke County Development Corp., but it did not adversely affect the coalition, again because the membership was so broad based and was accepted by a broad segment of the target public from the outset.

Public relations people and the techniques they use to influence opinion are the focus of blame if a coalition is seen as ineffective or unethical. It is the reputation of the public relations professional or firm

which suffers if a coalition is seen to be unethical or ineffective. Media coverage of Citizens for Riverboat Gambling centered on the two members of the public relations firm who formed a front coalition, not on Argosy Gaming. Media coverage of Citizens for a Free Kuwait delved into the many perceived unethical actions of public relations firm Hill & Knowlton. Just one of those actions was providing a Congressional witness whose identity was hidden and who may have presented false testimony. In an analysis of controversial clients accepted by Hill & Knowlton, Roschwalb concludes that it is the actions of the public relations firms which are the ethical issue rather than whether or not a client deserves public relations representation (Roschwalb, 1994). Further, it must be concluded that since it is the reputation of the public relations person/firm which is damaged if a coalition goes astray, then the public relations practitioner must stand firm as the ethical guard on conduct of the coalition.

Guidelines or principles for the formation and operation of coalitions would be useful for all involved publics. The Public Relations Society of America code, in general, offers good guidelines for public relations people to follow. Practitioners who conduct their individual and corporate activities in accordance with the articles of this code could feel that their actions would withstand the test of publicity (Bok, 1989). The International Association of Business Communicators code, because it is more general in nature, is of less practical use. Specifically, the PRSA articles which address dissemination of truthful information, disclosure of clients represented, and operation in the public interest are relevant to coalitions. However, this research has pointed to some specific guidelines for coalitions.

Guidelines

Numerous public affairs professionals have offered guidelines for the mechanics of forming coalitions which can operate effectively to accomplish public affairs goals. These guidelines include identifying potential allies, establishing governance, communicating with members (Haney, 1995; O'Connor, 1995; Pires, 1994). These guidelines are consistent with the suggestions made by the public relations professionals interviewed for this research.

Neely offered the most thoughtful and comprehensive suggestions for guidelines. One could argue that if all public relations professionals followed her suggestions, they could be confident of the ethical foundation of their efforts. Her suggestions included:

- Involve as broad a base of membership as possible. The broader based the interests represented, the stronger the position when the group goes forward;
- Be prepared to compromise. Understand that if groups and individuals give their names, money and involvement, one organization can't call all the shots;
- Be sure to know what points you'll give on and what you won't;
- Establish clear rules of governance for the coalition. This usually includes an Executive Committee which provides most of the dollars and makes most of the decisions; a Steering Committee including representatives of all participating organizations; legal council; public relations support; reporting procedures; meeting schedules, etc.;
- The bottom line is full disclosure. People have to understand what they're signing up for (what's the threat, what do they stand for, what's the cost).

The suggestions offered by Gillette are consistent with Neely's thoughts but are less comprehensive and show the impact of the Polk and Clarke County experiences. He advises:

- Do the homework necessary to understand what you're trying to accomplish and who might be likely members of the coalition.
- Involve possible coalition members early. Listen to their interests. Learn from them. Build the coalition quietly.
- Have a strategic plan and a solid base before going public.
- Keep focused on what the coalition is trying to accomplish.
- Spreading out funding sources prevents "they're buying the vote" concerns. But how funding is handled depends on the situation, so it can't be a no or yes guideline.

Mankiewicz advised that good coalitions can be effective but that bad coalitions are clumsy, ineffective and transparent. Having everyone in an industry involved makes sense but the coalition has to represent the interests of everyone in the group and this can be difficult. If one person or group controls the entire effort, it can be clumsy. He offered one guideline for coalition consideration:

Be out in the open and tell the truth. Then you never have to remember what you said.

Guidelines: Ethical Suggestions

The following guidelines focus on aspects of coalition formation and operation which ensure the coalition can withstand ethical scrutiny. Articles of the PRSA Standards for the Practice of Public Relations have served as a basis for some of these guidelines. A brief discussion addresses factors which may be taken into consideration with regard to each guideline.

1. The coalition must represent a genuine commonalty of interests as opposed to a contorted group of interests.

Discussion. Front organizations are often thrown together rapidly to respond to an immediate crisis. As a result, the member interests may not be truly singular but rather represent more of a marriage of convenience. Organizations with public affairs interests are advised to develop allies well before the crisis so that then the need arises an effective and legitimate coalition can be formed efficiently.

The broader the involvement, in terms of individuals and groups who seek to achieve a common objective, the more likely the group is to actually operate, and to be seen by various publics as operating, in the public interest.

Since a broad range of groups joining a coalition are not likely to share all goals in common, full disclosure and discussion of the specific goals for which the coalition stands, how the coalition will operate, and on which points the coalition may diverge is critical.

2. A representative membership must belong to the coalition before the group formally presents itself to the public.

Discussion. A coalition may gain momentum after it becomes public, attracting more members after the issue is openly discussed. However, a coalition is not a coalition, and should not be publicly presented as one, when only one or two organizations are involved. This guideline assumes a broader definition of "coalition" than sometimes operates in federal circles where a trade association, for instance, may be seen as a coalition.

This guideline offers advantages both to the coalition and to the public. For the coalition, a strong base of members (a "letterhead committee" augmented by grassroots members) helps ensure there truly is a common

interest among individuals and organizations to promote a cause and that a coalition is the right public affairs tool to enlist. Further, a base of members prevents the embarrassment and potential reputation damage of having a front organization exposed by the media or competing groups. For the public, the ability to trust and have confidence in coalitions is tantamount. Coalitions following this guideline do not relieve the public from a responsibility to ask questions, to determine if this coalition represents their specific interests.

3. Coalitions should practice full and timely disclosure of their membership, their funding, and their goals.

Discussion. It goes without saying that coalitions should be aware of and comply with all legal requirements for disclosure of funding, membership and lobbying activities. Beyond the legal requirements, coalitions should pro-actively make policy makers, media, and (to the extent practical) the public aware of this same information. This disclosure will increase overall public confidence in coalitions and as a result increase effectiveness of coalitions.

This guideline builds from Article 8 of the PRSA Standards: “A member shall not use any individual or organization professing to serve or represent an announced cause, or professing to be independent or unbiased, but actually serving another or undisclosed interest.”

Mass media advertising, literature, and other mass-distributed communications tools, are vehicles which carry the greatest potential for deception. To the extent practical, membership and funding sources should be disclosed in these vehicles.

4. Coalition funding should come from a broad base of members in representative amounts.

Discussion. Funding source is often a critical issue to a coalition. Coalitions need to recognize the perceptual and actual questions which arise related to funding. A broad base of funding is advisable to ensure broad participation by members in goal setting and decision making, and to deflect public concern that the coalition is really only the interest of one organization. If the coalition decides that funding from only one or two sources is the route which must be followed, the coalition needs to be aware of the attention which is likely to be focused on this issue by the media and public. If a single source of funding is chosen, it becomes even more important that the coalition include a broad and legitimate grassroots membership to deflect the concern that the coalition is a front group.

5. Coalitions should not intentionally communicate false or misleading information and shall act promptly to correct erroneous communications for which it is responsible.

Discussion. This guideline is similar to the PRSA Standards Article 5. It is clear.

6. Coalitions shall not engage in any practice which has the purpose of corrupting the processes of government.

Discussion. This guideline is an adaptation of Article 6 of the PRSA Standards. Because of the inherent goal of special interest groups and coalitions to influence the public policy agenda, it is particularly important that coalitions operate in a manner that does not corrupt government processes.

In summary, public relations practitioners who follow these guidelines when forming or working with a coalition could be reasonably confident of withstanding the test of publicity. In addition, members of the media, policy

makers or individuals wishing to evaluate a coalition effort could be relatively confident the coalition represents a broad segment of the public interest and is operating ethically if the coalition was operating within these guidelines. Each segment would need to determine if the coalition represents *their* interest, but that is another discussion.

Recommendations For Further Research

This thesis has revealed several questions which would benefit from additional study. Among them:

- Can the influence/effectiveness of coalitions in impacting the public policy agenda versus individual efforts in impacting the policy agenda be quantified?
- What has the trend in the use of coalitions been and have coalitions proven particularly effective against any particular types of issues?
- A comparison of the effectiveness of recognized front groups versus legitimate coalitions in achieving their desired goals.
- How well do federal policy makers understand the make up of the coalitions lobbying them?
- What kind of impact does mass media advertising by coalitions have on public awareness/understanding of issues and on action taken relative to those issues?
- How are media manipulated by special interest groups to help these SIGs achieve their goals?
- Why wasn't there more intense media coverage and analysis of the Coalition for Health Insurance Choices?

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Appendix A

Code of Professional Standards for the Practice of Public Relations

Public Relations Society of America

This code was adopted by the PRSA Assembly in 1988. It replaces a Code of Ethics in force since 1950 and revised in 1954, 1959, 1963, 1977, and 1983. For information on the Code and enforcement procedures, please call the Board of Ethics chairman through PRSA Headquarters.

Declaration of Principles

Members of the Public Relations Society of America base their professional principles on the fundamental value and dignity of the individual, holding that the free exercise of human rights, especially freedom of speech, freedom of assembly, and freedom of the press, is essential to the practice of public relations.

In serving the interests of clients and employers, we dedicate ourselves to the goals of better communication, understanding, and cooperation among the diverse individuals, groups, and institutions of society, and of equal opportunity of employment in the public relations profession.

We pledge:

To conduct ourselves professionally, with truth, accuracy, fairness, and responsibility to the public;

To improve our individual competence and advance the knowledge and proficiency of the profession through continuing research and education;

And to adhere to the articles of the Code of Professional Standards for the Practice of Public Relations as adopted by the governing Assembly of the Society.

Code of Professional Standards for the Practice of Public Relations

These articles have been adopted by the Public Relations Society of America to promote and maintain high standards of public service and ethical conduct among its members.

1. A member shall conduct his or her professional life in accord with the public interest.

2. A member shall exemplify high standards of honesty and integrity while carrying out dual obligations to a client or employer and to the democratic process.

3. A member shall deal fairly with the public, with past or present clients or employers, and with fellow practitioners, giving due respect to the ideal of free inquiry and to the opinions of others.

4. A member shall adhere to the highest standards of accuracy and truth, avoiding extravagant claims or unfair comparisons and giving credit for ideas and words borrowed from others.

5. A member shall not knowingly disseminate false or misleading information and shall act promptly to correct erroneous communications for which he or she is responsible.

6. A member shall not engage in any practice which has the purpose of corrupting the integrity of channels of communications or the processes of government.

7. A member shall be prepared to identify publicly the name of the client or employer on whose behalf any public communication is made.

8. A member shall not use any individual or organization professing to serve or represent an announced cause, or professing to be independent or unbiased, but actually serving another or undisclosed interest.

9. A member shall not guarantee the achievement of specified results beyond the member's direct control.

10. A member shall not represent conflicting or competing interests without the express consent of those concerned, given after a full disclosure of the facts.

11. A member shall not place himself or herself in a position where the member's personal interest is or may be in conflict with an obligation to an employer or client, or others, without full disclosure of such interest to all involved.

12. A member shall not accept fees, commissions, gifts, or any other consideration from anyone except clients or employers for whom services are performed without their express consent, given after full disclosure of the facts.

13. A member shall scrupulously safeguard the confidences and privacy rights of present, former, and prospective clients or employers.

14. A member shall not intentionally damage the professional reputation or practice of another practitioner.

15. If a member has evidence that another member has been guilty of unethical, illegal, or unfair practices, including those in violation of this Code, the member is obligated to present the information promptly to the proper authorities of the Society for action in accordance with the procedure set forth in Article XII of the Bylaws.

16. A member called as a witness in a proceeding for enforcement of this Code is obligated to appear, unless excused for sufficient reason by the judicial panel.

17. A member shall, as soon as possible, sever relations with any organization or individual if such relationship requires conduct contrary to the articles of this Code.

IABC CODE OF ETHICS

The IABC Code of Ethics provides communication professionals with guidelines of professional behavior and standards of ethical practice. The main purpose of the IABC Code – including its system of enactment – is educational. The Code exists to inform and educate members in the areas of communication and information dissemination, standards of conduct, confidentiality/disclosure and professionalism. It focuses on helping individuals develop ethical decision-making skills independent of IABC policy.

COMMUNICATION AND INFORMATION DISSEMINATION

1. Communication professionals will uphold the credibility and dignity of their profession by encouraging the practice of honest, candid and timely communication.
2. Professional communicators will not use any information that has been generated or appropriately acquired by a business for another business without permission. Further, communicators should attempt to identify the source of information to be used.

STANDARDS OF CONDUCT

3. Communication professionals will abide by the spirit and letter of all laws and regulations governing their professional activities.
4. Communication professionals will not condone any illegal or unethical act related to their professional activity, their organization and its business or the public environment in which it operates.

CONFIDENTIALITY/DISCLOSURE

5. Communication professionals will respect the confidentiality and right-to-privacy of all individuals, employers, clients and customers.
6. Communication professionals will not use any confidential information gained as a result of professional activity for personal benefit or that of others.

PROFESSIONALISM

7. Communication professionals should uphold IABC's standards for ethical conduct in all professional activity, and should use IABC and its designation of accreditation (ABC) only for purposes that are authorized and fairly represent the organization and its professional standards.

Appendix B

Iowa Ethics and Campaign Disclosure Board
Lynette A. F. Donner
Legal Counsel

Background: The IECDB monitors and enforces two areas: campaign disclosure and administrative branch ethics. IECDB defines public interest groups as those involved in an election or those opposing someone/something in an election.

Q1. Which rules are the cause of most concern?

A1. The paramount thing - reason for being - is to answer "where they get their money and how do they spend it."

Q2. Which rules are most frequently violated?

A2. There is a \$500 limit on raising funds before disclosure forms must be filed. Organized candidates and groups know this. The problems usually occur with neighborhood groups, i.e. a group opposing a school bond issue, which are focused on economic development or are personally opposed to the issue and don't realize they have become a political committee. "They're turned in to us. We don't have to go out and seek them." (This raises the question of who is really the watchdog - the media or opposition groups?) We don't oversee the groups. The county auditors have the forms which the groups need to file. IECDB enforces after a violation.

The problem is usually on disclosure on ads or brochures which must have a "paid for by ..." statement. Again these violations are usually be people don't know about the rule. However, the intentionally sneaky ones are most difficult to track down.

Q3. Are there different rules or not-for-profit, corporations, government agencies? Why/Why not?

A3. There are differences for candidate elections. Interest groups funding must be separate from corporate dollars. Corporate dollars can't be used for/against candidates. However individuals can contribute through a corporate-organized political action committee (PAC). Corporations are an amassment of capital. If that capital is used to buy candidates, it may corrupt the political process and harm the integrity of the electoral process. One of the problems seen in Iowa is that corporations are not so much an accumulation of wealth as a tax shelter for 'mom & pop' businesses. However, a corporation is a corporation regardless of size and the rules apply.

Q4. What has been the trend in these laws? More/less?

A4. The laws are continually becoming more detailed. The law is fairly reactive to situations. Right now candidates have a list of what they can and can't do with contributions. PAC's have no limitations on what they can do with the dollars. A little more than a year ago, a scam PAC emerged. There was no legitimate purpose for it. They filed the forms, but none of the dollars went to candidates, ballot issues, etc. All money was used internally. While Donner didn't have all the details, she said it could be argued that it was used for personal benefit. There is a bill before the Iowa legislature that funds have to be used for the stated purpose for which the group was organized. Another aspect of the bill would allow control over such things as telemarketing by PAC's. It will probably get out of the Senate but maybe not out of the House because of time.

Q5. What has driven these new rule considerations?

A5. Can legislate ethics when it's of a concrete nature. It's a different story when it gets into interpersonal relationships.

Industry could be legislated if not operating ethically. In a sense, all laws are a codification off the morals of society. Killing is bad, so it's illegal. Taking money for other than the stated purpose could be considered bad as well, so it could become illegal. Where there isn't so common a ground, it's tougher to legislate morality.

Q6. Why was the IECDB established?

A6. Before 1993, it was the Campaign Finance Disclosure Commission. The focus was on legislature. Then there began to be the same concern with regard to the Executive branch. So the Board gained the added responsibility for ethics as they related to the administrative branch of government. In part this was in reaction to people leaving and taking up lobbying and also to Joe Welch, a senator who was deemed to have a conflict of interest in that while he held an elected position with the state, he worked for a company selling securities to the state and did so using the resources of his public office.

Q7. How are the laws enforced?

A7. The Board is set up to respond to complaints brought to them formally or informally. Mostly the Board is involved with people seeking advisory opinion. They have the power to fine or take court action but haven't had to on the executive ethics side. Fines are related to improper disclosure are routine.

Q8. Is there consistency in the laws with other states.?

A8. States aren't greatly dissimilar although states do customize to their own situations as Iowa has. The system of reporting is common although thresholds vary from state to state. All states take their starting place from the federal reporting system.

Q9. The Citizens for Riverboat Gambling (a front group) was described as a new/deceptive way of influencing public opinion. Were there any changes in rules that came up after that situation?

A9. No. "The disclosure function is meant to pierce that veil" of who is behind the name of an organization. There has been discussion of whether we should limit how much a corporation can contribute to ballot issues. However there would be constitutional issues. The question would be if it corrupts the integrity of the electoral process. She's not sure a case could be made that corporate money has been able to change the underlying community opinion on an issue. In Polk County Argosy gave all the money and lost because community opinion was opposed to the project; in Clarke County, Argosy gave all the money and the ballot issue passed because community opinion supported the project. If she were to argue a case for or against a corporate giving cap, she'd have to argue that in some way the corporate dollars were able to substantially change community opinion. Also, an issue is not something you can buy (unlike a candidate) and then pull the strings on it over time.

Wright Andrews, Esq.
 Butera & Andrews
 President
 American League of Lobbyists

Mr. Andrews is a lawyer and lobbyist who has worked in Washington, D.C. for the past 20 years. He is the president of the American League of Lobbyists, a national association founded in 1979 and dedicated to serving government relations and public affairs professionals. He provided an overview of the Lobbying Disclosure Act of 1995, why and how it was passed, and the Act's implications for coalitions.

He said: The old law, which had been on the books since the late 1940's was unclear and unenforceable. As it was written, it was a joke; it was meaningless. It had been recognized as totally inadequate for 20 years. Numerous hearings had been held about changing the law, but they could never get passed through both houses.

The Lobbying Disclosure Act of 1995 was brought up in close to its present form in 1994 but was defeated based on trumped up charges regarding how grassroots groups would be affected. The 1995 Congress passed the bill although even this bill was cut back in many ways.

While this new law is not perfectly clear, it does require greater disclosure. It is fairly clear on who has to register. In spite of some gaping loopholes, it requires most lobbyists to register. At least they have to indicate what they were hired to work on, by whom and how much they were paid. This law is better. It will lead to disclosure.

If someone were to read the old law, it would not seem to be as ineffective as it was in practice. The federal law was gutted by court interpretation. In 1948 or 1952, the Supreme Court interpreted the bill very narrowly so it wound up not having the depth it appears to on its face.

Under the old law, coalitions gave corporations, organizations and lobbyists something to hide behind. Some corporations did not want it to be known that they wanted to affect public policy. So a coalition would be formed and since disclosure of who was funding/involved in the coalition was not required, organizations could become involved in affecting policy without public knowledge. Over the years there have been more coalitions. Most are legitimate in the broad sense but some were put together to hide behind.

The new Act is murky on when disclosure has to happen on coalitions, but contributors of over \$10,000 have to be disclosed.

Various groups are treated differently by the new Act. Not for profit groups have to register except for churches and state and local organizations. Congress battled back and forth on this. Not for profits use federal funds to carry out their ideological agendas yet they wanted to be exempt from registering as lobbyists. The limited provision which exists in the 1995 Act was dropped in as an after thought. As far as public policy is concerned, there is no valid reason to have broad general exemptions for these groups.

If the churches want to get involved in public policy discussions, they can, but they should have to disclose this involvement.

The new law is not that burdensome. It is the position of the American League of Lobbyists that it is helpful to the lobbying profession to have a law that's clear, to have disclosure, to clear up the misconceptions that have occurred because of the way the old law was interpreted.

Appendix C

Graham Gillette
Pinnacle Communications
Represented Argosy Gaming
Citizens for Riverboat Gambling
Clarke County Development Corporation
Interview conducted: January 25, 1996

Q1. What was the coalition's stated objective?

A1. In both cases, the objective was to bring a new economic opportunity to the area, bringing jobs and associated businesses to the area. To accomplish the objective, voters in each county would need to pass the county referendum vote required to enable casino riverboat gambling.

Q2. Who were intended to be members of the coalition?

A2. In Polk County, members were to be business and community leaders. The coalition wanted these leaders to say that from a business and a personal standpoint, CRG would be good for the area. The objective was to have these influencers buy in and then sell the concept to the voters. However, "It ended up as a coalition of one."

In Clarke County, the initial members were the Clarke County economic development committee. They called Argosy before the Polk County vote and invited Argosy to work with them to bring the project to Clarke County. The effort was a bi-partisan community initiative led by the CCDC. The project was funded by Argosy. The boards of supervisors of surrounding counties were approached by CCDC to gain their support. All of them did pass resolutions supporting the Clarke County project. They felt that had as strong a political base as possible. Vote passed by 70%.

Q3. How were these individuals/organizations contacted and their support enlisted?

A3. In Polk county, one-on-one meetings were held with City Council members. These were initiated by Argosy and Gillette. The City Council suggested Grays Lake as the site, which Argosy pursued to the point of buying the property for development. Individual meetings were held with business leaders, some of whom seemed favorably disposed toward the project until prominent city leaders, Jack Rehm (Meredith Corporation) and David Hurd (Principal Financial Group) said no.

In Clarke County, The lead on contacts was taken by CCDC. Community education meetings were held to educate the broader population. These were initiated by CCDC with Argosy attending to provide information. CCDC also contacted members of the County's legislative delegation and Boards of Supervisors of surrounding counties to enlist their support.

Q4. What was the baseline for number of members signed up before the coalition went public?

A4. No specific number in Polk County. Meetings were held with government and business leaders. First with the city manager and council.

In Clarke County, the base was the CCDC which included the mayor, a bank leader, and various business leaders. A bi-partisan group. The local group determined what was best in terms of additional contacts/meetings. Argosy was supportive. For instance they held job fairs and at one, they received 1,500 applications in a day's time.

Q5. What was the intent for the coalition to communicate with coalition members on an ongoing basis?

A5. In Polk, because the coalition never actually materialized, in fact, this did not come into play.

In Clarke, a series of educational events were held with citizens/voters. These informed attendees about the proposed site, environmental impact and job potential. There was constant communication between members of the core coalition group and Argosy. Argosy did the work in terms of providing technical support, statistics, etc., as well as being a media spokesperson on technical subjects.

Q6. How were members involved/activated?

Q6. Not applicable in Polk County.

In Clarke County, elected officials, i.e. legislators and boards of supervisors were involved to give credibility to the project. Their support took many forms, i.e. resolutions, media interviews, letters to the editor.

Q7. What was the source of the coalition's funding?

A7. 100% Argosy in both cases. In Polk County, the bulk of the money was spent on a television and radio advertising campaign.

It cost less in Clarke County. Money was used to produce two direct mail pieces to send to everyone in Clarke County., produce a couple of radio spots, and billboards. "It was obvious it was a community effort" The pieces quoted people in the community; looked local; didn't come across as big money.

Q8. Did all coalition members contribute financially? Why? Why not?

A8. Not applicable in Polk County.

In Clarke County, No. It was discussed at length and decided that people knew the county had gone after Argosy and that the county wanted to partner with Argosy. The county had decided: "It's Argosy or nothing so they didn't mind taking money from Argosy for the campaign."

Q9. How did the coalition communicate about its membership and its activities to the public, policy makers and the media?

A9. In Polk County, the coalition was a communication strategy brought forward when the ads were being produced. When the media asked, the coalition was honest about who they were and who their backing was.

Previously mentioned communication campaign to Clarke County residents; participated in all interviews. Osceola Sentinel wrote about it weekly; editor was on CCDC. Sought DM media coverage around events. CCDC members made contacts with policy makers.

Q10. What media coverage was there of coalition membership?

A10. Membership in the Citizens for Riverboat Gambling was a major issue in Des Moines Register coverage because it was learned early that there were only two members in the coalition.

With regard to the Clarke County project, there was no coverage of the membership, per se, although there were quotes from many people who were supportive of the project.

Q11. What media coverage was there of coalition activity and how did the coalition perceive that coverage?

A11. Gillette was very careful not to speak for coalition. Mary Ellen Kimball, member of CCDC, was local contact

Q12. Were guidelines used in establishing the coalition membership?

A12. Only guideline was to involve business/community support which would help Argosy see the project as an economic development opportunity for Polk county.

In Clarke County, after experiencing the problems in Polk County, the strategy was to let the local leaders take the lead in all cases with Argosy providing information and financial support as necessary.

Q13. What considerations were given to naming the coalition?

A13. In Polk County, they wanted to use "citizens" because they were convinced they would have citizen involvement. Since they used the name without actually having citizen membership, it "turned out to be a huge negative."

In Clarke used a different approach. Wanted a down home name and look. While there was a tag line, "Vote 4 The Boat," the effort was under the auspices of a standing group, the Clarke County Development Corporation. A logo was developed by high school student.

Q14. Is the coalition an ongoing entity?

A14. No. Not in either case.

Q15. If the coalition is no longer active, how do you evaluate the effectiveness of the coalition in accomplishing its objective?

A15. In Polk County, the coalition was not effective and may even have been a detriment since it was seen as a sham.

In Clarke County, it was highly effective because it was a broad based, bi-partisan community effort.

Q16. In retrospect, would you use a coalition again if you faced the same situation again?

A16. A casino can't just come to a community and get this kind of project passed. It has to be driven by the community. The Polk and Clarke County projects are a good lesson for casino promoters.

Q17. Were there ethical considerations/concerns that arose at any time during the existence of this coalition?

A17. In Polk, Gillette felt Argosy did things right because they felt the walked away with not being bad guys, just had a bad idea. Very up front, never hid.

There were great debates about funding in Clarke County. Great care was always taken to run dollars through the coalition. A committee was formed to file reports with county auditors.

Q18. Do you think the coalition technique is being misused or abused by special interest groups?

A18. "We clearly misused it in Polk County." They moved ahead with the coalition even though they didn't have members signed up because: "we felt we had to get a jump on the competition. We may have been successful if we'd had more time and had the coalition formed before it was announced. Maybe we could have been successful."

This kind of misuse "causes people to be cynical of coalitions." Gillette keeps the Citizens for Riverboat Gambling logo on his shelf as a reminder of what not to do. He feels he learned more from the mistake than from the success.

Q19. What guidelines do you believe should be taken into consideration by public relations people, corporations and special interest groups in establishing coalitions?

A19. Do homework to understand what you're trying to accomplish and who are likely to be a base of coalition. Go to them, listen to them, learn from them and build the coalition quietly. Perhaps it does not need as broad but rather as strong a base as possible. Doing this will create a well mapped out strategic plan. "We never had a plan just that we were going to pass the referendum: Trust us."

Keep focused on what you're trying to do

Spreading out funding prevents "they're buying the vote" concerns.

But it will depend on the situation, so this can't be a no or yes guideline.

General comments

The coalition worked in Clarke County because it was a truly community driven coalition. We got it backwards in Polk County. We tried to fake a coalition here. We really did believe we had the support. Lots of people said they supported us but couldn't do it in public.

Historically riverboat gambling comes into a community with economic problems. They were not asked to come to Polk, Argosy picked the community. Polk County politicians were okay, but the problem was employer groups who thought the project would take from an already tight employee base. Clarke County contacted Argosy.

Susan Neely, Senior Vice President, Director of Communications
Health Insurance Association of America
Coalition for Health Insurance Choices (CHIC)
Interview Conducted - February 24, 1996

Q1. What was the coalition's stated objective?

A1. To pass comprehensive health care reform at the federal level that achieves health care that serves everyone. We would have sought universal insurance coverage if we had an employer mandate. This was difficult because we needed business support and businesses didn't support employer mandate. This cut us off from many natural allies. Some businesses wouldn't get in at all. CHIC was not consistent with their missions.

Neely felt the Arthritis Foundation which had originally signed up as a member of CHIC and later withdrew was leaned on by the Democratic National Committee to pull out.

The "Harry & Louise" ads were tagged: "Sponsored by the Coalition for Health Insurance Choices. Primary funding by the Health Insurance Association of America." This helped organizational/coalition credibility when they came under media scrutiny since there was no deception about who was funding the effort.

Q2. Who were intended to be members of the coalition?

A2. HIAA staff were assigned to approach potential members who would represent a broad base of HIAA member companies, businesses and other organizations interested in health care reform. Many coalition partners were listed on CHIC letterhead and many were not. The ones who were not listed on the letterhead just exchanged Info every week.

HIAA started with groups who would be publicly supportive -- "the Letter head committee." HIAA said they didn't need money from these organizations, just needed their name and manpower.

Then HIAA added individuals, mostly through the ad campaign. 430,000 individuals called the 800# included in the television ads. Those who called were sent a packet of information about CHIC's goals. 43,000 people returned a card from the packet asking for membership. These individual's names went into a database and they were asked to do things supportive of the coalition. There were provided with letter writing points, bumper stickers, etc. HIAA experienced high response rates when HIAA asked them to do something.

Q3. How were these individuals/organizations contacted and their support enlisted?

A3. Organizations were given a packet including the CHIC vision in total and individual white papers on key issues HIAA objected to most. They were asked to sign a card saying they agreed to be members. Each organization provided name, phone, FAX, signature. Individuals were asked for this too.

All were added into the database. HIAA was scrupulous about getting and recording this information in case anyone asked.

Q4. What was the baseline for number of members signed up before the coalition went public.

A4. For letterhead purposes HIAA wanted to have 10-20 organizations who brought credibility. "To some degree it's the quality," Neely said, rather than a specific number of organizations. **If they had signed the National Chamber of Commerce**, for instance, they could have gone faster. In California where HIAA had set up a coalition to address state issues, they had three big business groups and that was enough. "After we got to be heroes, others wanted to help. The National Organization of Manufacturers was an important one who joined us."

Q5. What was the intent for the coalition to communicate with coalition members on an ongoing basis?

A5. "We built an arsenal of people. Then when we had an issue, we could activate them."

Q6. How were the members involved/activated.

A6. There were many examples of how members were activated. For instance, when issues such as mandatory alliances, spending limits or the specific Clinton Health Reform Plan were being discussed, Call-to-Action Alerts were sent to CHIC members. Between February through June 1993, these Alerts generated 46,081 letters and mailgrams to Congress and to key members of congress in their home districts. Calls-to-Action were sent specifically for each relevant issue. Calls-to-Action were specific to CHIC member interests, i.e. mailings to small business members encouraged them to contact their Senators and express opposition to flat community ratings.

Q7. What was the source of the coalition's funding.

A7. All funds were from HIAA. They could get in-kind contributions from members, but pure dollars were HIAA.

Q8. Did all coalition members contribute financially? Why or why not?

A8. We felt we couldn't get the dollars. The people with big dollars, i.e. business groups, didn't want to give because they didn't agree with our objectives. **HIAA said members could carry the message as the front groups** and HIAA would put in dollars. Other groups disagreed with strategic approach. HIAA felt that if it was the future of their members at stake, they should pay. There were no obvious sources of cash. Also, with one funder, HIAA didn't have to dicker around with coalition members in the decision making process.

In California, businesses and others did pony up "We were adamant about it" but it makes it harder to make decisions.

Q9. How did the coalition communicate about its membership and its activities to the public, policy makers and the media?

A9. HIAA was "Not an optimum coalition" -- in terms of media and policy maker credibility. Didn't have the big names on letterhead. Inside the Beltway, it was seen as being totally an HIAA initiative, not a broad based coalition. Focus group testing showed the CHIC was much more credible outside the Beltway and in the ads. However, HIAA decided to continue to use the coalition inside the Beltway because with the citizens as members they felt they had enough to be credible.

The Washington Post article created serious problems for HIAA and the coalition. "At that point, any hope of making it a more broad based coalition was lost." "Based on stumble with the (publicizing of the) campaign plan, we considered dropping the coalition." Because the focus group research showed the coalition continued to be credible outside Washington, CHIC was retained.

In 1995, HIAA disbanded the legal entity CHIC, but HIAA continues to use the name with citizen volunteers.

Q10. What media coverage was there of coalition membership?

A10. Other than the Times and the Post, none. HIAA assumes some similar ones that trickled down from the Post coverage, but never any others. "We passed through the ring of fire and were never any better or worse than we said we were. But we were never what we could have been," because of the Post article. However by then, Jan. 1994, 100 groups had surfaced who acted like a coalition for HIAA.

In the end, what HIAA didn't get was the public power of coalition but did they get the support work of a coalition.

HIAA was a hot information source on ads, policy, etc. They'd take HIAA counsel on timing and message and recycle it through their systems.

Q11. What media coverage was there of coalition activity and how did the coalition perceive that coverage?

A11. The Harry & Louise ads were used to focus attention on HIAA message points and were considered a public relations triumph by HIAA. A news conference was held to introduce each new wave of advertising. HIAA and the ads gained even more visibility and credibility when the Clinton's did a parody of Harry and Louise during the Washington Gridiron event.

HIAA considered the bulk of this coverage to be highly positive. The ads generated far more news coverage of HIAA messages than they ever had imagined possible. The downside of the ads was that entertainment media such as People magazine began to focus on Harry and Louis as real people rather than as actors. Managing this attention took time and diverted attention from other more important activities.

Also, the Post and Times coverage which focused on the HIAA strategic plan and members who had left the coalition effectively kept HIAA from recruiting the kind and number of coalition members they had wanted.

Consequently, the media coverage kept them from being as effective as a coalition as they had planned.

Q12. Were guidelines used in establishing the coalition membership? What were there.

A12. No.

Q13. What considerations were given to naming the coalition?

A12. The name stemmed from the HIAA Vision. HIAA was opposed to the Clinton plan for regional purchasing plans. Research showed that people were concerned about lack of choice. Opinion research was so critical. Tested words, and messages. "Choice" was a loaded word.

Q14. Is the coalition an ongoing entity?

A14. See answer 9.

Q15. If the coalition is no longer active, how do you evaluate the effectiveness of the coalition in accomplishing its objective?

A15. The coalition as it evolved was not the driver of the campaign. It was HIAA. It should have been CHIC. The reasons were our positions which potential partners did not agree with, the Post article which scared people away, and some of our strategies which others didn't support.

In California, it worked as it should. As it turned out, CHIC became useful as a tagline on ads and to activate citizen volunteers. 100 organizations came in afterwards, but to exchange information -- not to make decisions.

As a key part of the strategy, it was not what it could have been. From a DC standpoint, it was not an "effective"/legitimate coalition.

Q16. In retrospect, would you use a coalition again if you faced the same situation again?

A16. "I would always use a coalition. It takes the initiative away from being that of an individual group or organization. It increases clout and credibility I'd always opt for greater involvement."

Q17. Were there ethical considerations/concerns that arose at any time during the existence of this coalition?

A17. Basic ethical considerations were:

- People need to know what we stand for
- People need to know what they're signing up to
- People need to know what strategies are being implemented

Bottom line is need for full disclosure

Q18. Do you think the coalition technique is being misused or abused by special interest groups?

A18. There are many organizations who just come up with a name to tag their efforts. This particularly comes up in ads. There is a big opportunity for abuse there. Many media do Ad Watch columns but they don't do analysis of coalitions and those sponsoring them.

"Which citizens and whose coalitions are problems media should/could do a lot more with."

Q19. What guidelines do you believe should be taken into consideration by public relations people, corporations, and special interest groups in establishing coalitions?

A19. "The strategic imperative is clear. The stranger the bedfellows, the stronger the coalition. The broader based the interests represented, the stronger the position when the group goes forward."

People have to understand what they're signing up for (what's the threat, what they stand for, what the cost) The hardest thing is forming a nucleus. Once they have that, it becomes easier having frank discussions.

We have to understand that we can't call all the shots if we want their names, money, involvement.

Everyone has to understand what we'll go along with/what not. Neely talks individually with the players to be sure everyone understands the other's agenda.

Setting up governance is an issue.

Executive committee -- most dollars and most decisions. Dollars, name and vote go together. If you want to make decisions, have to pay.

Steering Committee -- representatives of all participants

Legal council -- do we need it

PR firm -- who they report to

How often meet

The major fights are over dollars, decisions, PR firm

In addition to answering the questions in this interview, Neely provided three documents: "Vision and Advocacy Highlights: September 1994;" "Political Advertising and Health Care Reform," and "The Role of Advertising in the Health Care Reform Debate."

Frank Mankiewicz
 Vice Chairman
 Hill & Knowlton
 Represented the Government of Kuwait
 Citizens for a Free Kuwait
 Interview conducted: March 6, 1996

Q1. What was the group's stated objective?

A1. To make people aware of what Kuwait was and what was going on there.

Q2. What was the hoped for outcome of gaining public support from the American public?

A2. Kuwaitis living in the United States would feel better about themselves. Kuwaiti citizens (primarily students) who were living in the U.S. at the time felt they were suffering from the image of Kuwait that was being portrayed in the media. They would feel better about themselves if Americans understood their country better.

Q3. What was the baseline for number of members signed up before the group went public?

A3. The group was set up before it came to H&K for help. The students had taken their concern to a couple of former Kuwaiti government ministers who came up with the idea to form a national organization. They had no name and no structure when they came to H&K with the idea. So there were no specific numbers for the group.

Q4. How were the members involved/activated?

A4. A council was formed made up of a few people who were ministers in the Kuwaiti government, the dean of a law school and former members of the Kuwaiti parliament. They made the decisions and were the spokespeople. We were hired to set up rallies at campuses, get media coverage of those events. That's what we did.

Q5. Did all group members contribute financially? Why? Why Not?

A5. "I have no idea."

Q6. What considerations were given to naming the coalition?

A6. The group had already formed when it came to H&K.

Q7. How do you evaluate the effectiveness of the coalition in accomplishing its objective?

A7. Pretty good. There was a long article in Time toward the end of the year written by Michael Kramer that described Kuwait as a pretty good country in a bad neighborhood. It's true that women can't vote in Kuwait but they can't in other countries in that area either. The members of the

coalition who were former members of parliament were going to try to get changes made if they got their country back. They wanted to give parliament more power. Some of these members of parliament had been exiled before the war broke out and some were exiled as a result of the war.

Q8. Were there ethical considerations/concerns that arose at any time during the existence of the coalition?

A8. They wanted to be sure they were not seen as a group trying to affect U.S. policy. They were against U.S. force. It was a matter of pride. They didn't want to have to ask another country for help. They thought the economic sanctions against Iraq should be allowed to work.

Q9. Do you think the coalition technique is being misused or abused by special interest groups?

A9. Good coalitions are not, but bad coalitions are clumsy, ineffective and are seen through. Having everyone in an industry involved makes sense but it has to be representative of the group's interest. If one person/group controls it, it can be clumsy.

Q10. What guidelines do you believe should be taken into consideration by public relations people, corporations, and special interest groups in establishing coalitions?

A10. They should be out in the open and tell the truth. Then you never have to remember what you said.

Q11. How did the coalition perceive media coverage of the coalition?

A11. Media coverage was pretty good. One article in Harper's magazine by MacArthur reported on a lot of activities which were later proven to be inaccurate. This article seemed to be the genesis of the adverse attention on the coalition.

Q12. What was the story behind the Ambassador's daughter's testimony since this testimony also focused negative attention on the coalition?

A12. A Human Rights conference was being held in the Senate. The Senate asked the Citizens for a Free Kuwait for names of people who could testify at this conference. The ambassador's daughter was smuggled out of Kuwait and was prepared to testify about atrocities she had seen. The Ambassador asked Congressman Lantos not to give the girl's last name because they were afraid of reprisals against family members still in Kuwait. Lantos agreed. "We thought this was a mistake but we were not in control. Then the girl testified that she had seen several instances in which Iraqi soldiers had taken babies out of incubators, left them on the floor, and taken the incubators. It turned out she'd only seen one such instance."

There were certain mistakes the Citizens for a Free Kuwait made that hurt them. "We would have handled the hearing differently, but we didn't have control of that."

Jules Kroll, an investigator out of New York, was hired to track down Kuwaiti assets and to track down inaccuracies in what had been reported. This showed that a lot of what had been reported about Citizens for a Free Kuwait was inaccurate.

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